

Planning Policy & Built Heritage Working Party



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29 November 2019

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held in the Council Chamber - Council Offices, Holt Road, Cromer, NR27 9EN on **Monday, 9 December 2019** 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 Democratic Services & Governance Officer 24 hours in advance of the meeting and provide a copy of the question or statement. Statements should not exceed three minutes. Further information on the procedure for public speaking can be obtained [here](#) or from Democratic Services, Tel: 01263 516010, Email: democraticservices@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

Emma Denny
Democratic Services Manager

To: Mr A Brown, Mrs P Grove-Jones, Mr T Adams, Mr D Baker, Mr N Dixon, Mr P Fisher, Ms V Gay, Mr P Heinrich, Mr N Pearce, Mr J Punchard and Dr C Stockton

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

Heads of Paid Service: Nick Baker and Steve Blatch
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A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

(Pages 1 - 6)

To approve as a correct record the Minutes of a meeting of the Working Party held on 14 October 2019.

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

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.

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

7. BROWNFIELD REGISTER UPDATE

(Pages 7 - 22)

Summary: This report provides an update to the Brownfield Land Register 2019.

Recommendations: **Publication of the register as required by The Town and Country Planning (Brownfield Land Register) Regulations 2017.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Rakesh Dholiwar, 01263 516161 rakesh.dholiwar@north-norfolk.gov.uk	

8. LOCAL PLAN SCHEDULE OF REPRESENTATIONS - REGULATION 18

(Pages 23 - 848)

Summary: This report provides a precis of the responses received from the Regulation 18 consultation and explains the process for considering the responses as part of the finalisation of the Local Plan.

Conclusions: The feedback submitted as part of the regulation 18 consultation should be used to inform and assist in the preparation of the final version of the Local Plan.

Recommendations: **Members note the content of this report and delegate final adjustments of the Schedule of Representations to Planning Policy Manager and publish.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer(s), telephone number and email: Iain Withington, Planning Policy team leader, 01263 516034, Iain.Withington@north-norfolk.gov.uk	

9. NORTH WALSHAM - UPDATE

Officers will give a verbal update on the North Walsham delivery process.

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

11. 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.”

12. TO CONSIDER ANY EXEMPT MATTERS ARISING FROM CONSIDERATION OF THE PUBLIC BUSINESS OF THE AGENDA

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

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14 OCTOBER 2019

Minutes of a meeting of the **PLANNING POLICY & BUILT HERITAGE WORKING PARTY** held in the Council Chamber, Council Offices, Holt Road, Cromer at 10.00 am when there were present:

Councillors

Mr A Brown (Chairman)
Mrs P Grove-Jones (Vice-Chairman)

Mr T Adams
Mr N Dixon
Mr P Fisher

Ms V Gay
Mr P Heinrich
Mr J Punchard

Observers:

Mrs A Fitch-Tillett
Mrs W Fredericks

Officers

Mr M Ashwell – Planning Policy Manager
Mrs E Denny – Democratic Services Manager
Miss L Yarham – Democratic Services & Governance Officer

18 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Mr D Baker, Mr N Pearce and Dr C Stockton.

19 PUBLIC QUESTIONS

None.

20 MINUTES

The Minutes of a meeting of the Working Party held on 19 August 2019 were approved as a correct record and signed by the Chairman.

21 ITEMS OF URGENT BUSINESS

The Planning Policy Manager stated that an issue had arisen relating to the establishment of a delivery group for the North Walsham Development Brief which needed further discussion.

22 DECLARATIONS OF INTEREST

None.

23 UPDATE ON MATTERS FROM THE PREVIOUS MEETING

Minute 16 – Norfolk Strategic Planning Framework

The Chairman reported that the proposed modification to Agreement 10 which would allow North Norfolk to depart from the National Standard Methodology when assessing

local housing need had been accepted by the Duty to Co-operate Member Forum and would become part of the Norfolk Strategic Planning Framework policy.

24 FIVE YEAR LAND SUPPLY STATEMENT 2019

The Planning Policy Manager presented a report which set out a case for the publication of the Council's Statement of Five Year Land Supply for 2019-2024 calculated on 2016 household projections on the basis of 'exceptional circumstances' instead of using the 2014 figures required by the Government, following the receipt of specialist advice in respect of local housing needs for North Norfolk.

The Planning Policy Manager explained how the Five Year Land Supply was calculated. Using the 2014 household projections, North Norfolk could demonstrate a 4.5 year land supply, based on an annual requirement for 581 dwellings. However, the consultants' view was that the 2014 figures were sufficiently flawed that they should not be relied upon. The Planning Policy Manager referred to an appeal case at Sculthorpe at which the Inspector had ruled that on the balance of evidence presented by this Authority, the 2014 forecasts were an unreliable starting point for calculating need in the District. He also referred to a case in Central Bedfordshire which was currently subject to a High Court challenge. He explained that the 2016 household projections had produced a significantly slower growth rate than the 2014 projections. Applying the standard methodology to the 2016 projections resulted in an annual requirement of 479 dwellings which meant that the Council could demonstrate a 5.5 year land supply. This stance was likely to be challenged through the planning process and it would be for Planning Inspectors to decide if the Council's argument was robust. He recommended the publication of the Five Year Land Supply Statement on that basis.

The Chairman stated that he was astonished that the Government had taken the position that the 2016 statistics could not be used when they took more account of foreseeable population movement. He asked if the Planning Policy Manager knew the reason for the Government's stance.

The Planning Policy Manager explained that household forecasts were produced every two years and were trend based taking account of the historic situation. The Census, conducted every 10 years, provided a sense check. In North Norfolk, the Census figures indicated much slower growth in North Norfolk than earlier projections had suggested. The Government was not challenging the 2016 figures and acknowledged that they were robust; however the Government had said that they should not be used as they did not deliver its policy target of 300,000 homes per year. The 2018 forecasts were due to be published shortly and there was a high probability that they would also show lower growth requirements. The Government was reviewing its methodology and whilst it was possible that there would be a change in methodology which resulted in different patterns of growth, it was unlikely that the Government would revise its overall target.

Councillor Mrs P Grove-Jones expressed concern that an impossible target had been set for North Norfolk. There were areas in the north of the country which were desperate for growth and she did not consider that the Government's methodology would deliver sensible levels of housing throughout the UK.

The Planning Policy Manager explained that all figures were trend based. Projections in the north of the country would be small due to historic low growth rates. The standard methodology was a floor and there was nothing in the guidance which prevented Local Planning Authorities setting higher targets. The standard methodology tended to produce higher numbers in areas which were attractive to retire to. House prices would escalate if insufficient homes were built to meet the demand.

Councillor Grove-Jones considered that migration for retirement did not help the area economically. Young people would go elsewhere if they were unable to find jobs or affordable housing.

Councillor Ms V Gay stated that this Authority had always had provision of housing at the top of the agenda, but it had to be reasonable and evidence based. The current evidence supported a target of 479 dwellings and she proposed that the five year land supply statement be published on that basis.

Councillor N Dixon considered that the Planning Policy Manager had put forward a compelling and convincing argument for applying the exceptional circumstances provision. Whilst this was open to challenge, the evidence supported the trend towards a lower growth rate and use of the 2016 projections. He seconded the proposal.

The Chairman considered that the risk of challenge was one which the Council should take on board and he was confident that the evidence supported the recommended action.

RESOLVED unanimously

That the Statement of Five Year Land Supply 2019-2024 is published on the basis of a Local Housing Need for 479 dwellings per annum inclusive of a 5% buffer.

25 NORFOLK COUNTY COUNCIL MINERALS AND WASTE LOCAL PLAN CONSULTATION DOCUMENT TO REPLACE THE EXISTING MINERALS AND WASTE CORE STRATEGY AND SUPPORTING DEVELOPMENT PLAN DOCUMENTS (DPDs)

The Planning Policy Manager presented a report which reviewed the proposals in the Norfolk County Council Minerals and Waste Local Plan consultation document and its potential implications for North Norfolk and the emerging North Norfolk Local Plan. The Council was one the consultees on the Plan, which was subject to wide ranging consultation. Whilst there appeared to be no conflict with the North Norfolk Local Plan, he recommended that a final response to the consultation be withheld until the wider community response was known. There would be an opportunity to submit a response in the next round of public consultation on the document.

In answer to a question by Councillor Mrs P Grove-Jones regarding mineral rights in relation to dwellings, the Chairman confirmed that mineral rights were recorded as a land charge in general terms but it was necessary to carry out further enquiries of the relevant authority to ascertain its future intentions with regard to them.

Councillor N Dixon declared that he was a County Councillor but he did not sit on the Planning Regulatory Committee and had not had any involvement in the production of the policy, therefore he was sufficiently distanced to be able to comment that he had no concerns and supported the recommendation.

Councillor P Heinrich stated that there was some disquiet from the North Walsham Town Council regarding the North Walsham site Min 115 but this was mainly related to the environmental impact of transporting the minerals rather than the principle of the allocation. The site had been allocated previously so its allocation was not a matter for concern.

The Planning Policy Manager explained that each allocation had a specific policy attached to it and all were caveated with sensible environmental controls. If there was

a large amount of opposition to any of the sites, this Council could reflect on it before finalising its view.

Councillor Ms V Gay proposed the revised recommendation with the addition that conditions relating to traffic agreements, hours of use and routing are requested.

RESOLVED

That Norfolk County Council be informed that North Norfolk District Council reserves its final position until such time as it has considered the wider responses in relation to the ongoing consultation, but requests that the allocations are subject to conditions relating to traffic agreements, hours of use and routing.

26 NORTH WALSHAM DELIVERY GROUP

This matter was considered as an item of urgent business.

The Planning Policy Manager referred to Minute 17 of the minutes of the meeting held on 19 August, where it had been resolved to establish a North Walsham Delivery Group comprising three Members who had been nominated by the Working Party. Subsequent to the Working Party's resolution, he had accepted nominations from other Members and the group now comprised five Members. He had anticipated that the Group would comprise a mix of Members and Officers as a steering group for the specific purpose of the preparation of the North Walsham Development Brief.

The first meeting had taken place as an informal briefing session, attended by the developer, and some of the workstreams had been outlined.

Subsequently, the Planning Policy Manager had been advised that the group had not been lawfully constituted. There were tensions around whether the group was a formally constituted working party or similar, in which case it would need to be Member led and formally minuted or, as he had anticipated, an Officer-led task and finish group on which he was anxious to have Member engagement for oversight purposes. He had requested nominations from North Walsham Members and was keen for a twin-hatter to provide County Council representation. The terms of reference of the group meant that the Working Party was in effect making recommendations to itself and had unintentionally created an administratively heavy and political process.

Further discussion was needed with the Monitoring Officer and Democratic Services Manager to find a way to have meaningful Member representation on the group without the full administrative burden of a formal Working Party. He sought Members' views on this matter for further consideration, and a further report would be brought to the Working Party to modify the group's terms of reference.

The Chairman stated that he had had a discussion with the Monitoring Officer and it had been decided that the Leader of the Council could appoint additional Members to the Delivery Group. Councillor E Seward had been nominated.

The Democratic Services Manager explained that the difficulty had arisen as it was a mixed Officer and Member group. A group which involved Members had to be treated as a Committee under the Council's Constitution, and Working Parties were treated as Committees. The group would have to operate as a Working Party or Sub-Committee comprising only Members, with Officers in a purely advisory role, and make formal recommendations through the Planning Policy and Built Heritage Working Party. She suggested that Members could be involved through a pre-meeting, or

Officers could meet and report back to the Working Party. Members made decisions and as constituted, Officers could not also sit on the group and make decisions.

Councillor N Dixon stated that Task and Finish groups were standard practice and reported to the Committees which established them. He supported the principle of the group but there was a need to find a mechanism to deliver what was required. There needed to be a degree of confidence that when the group reported back there could be further discussion, with assurance that the work that had been done was sound.

Councillor Ms V Gay supported Councillor Dixon's views. She considered that the first meeting had been very enlightening and clearly conducted and that the process should continue, but there was a need to find a constitutionally sound description of the group.

Councillor Mrs P Grove-Jones stated that Licensing and Appeals Committee had established task and finish groups which fed into the Committee. She considered that they worked efficiently.

Councillor Dixon added that task and finish groups were a very effective and efficient way of engaging Members and reporting back.

The meeting closed at 11.07 am.

CHAIRMAN

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Brownfield Land Register Update

Summary: This report provides an update to the Brownfield Land Register 2019.

Recommendations: **Publication of the register as required by The Town and Country Planning (Brownfield Land Register) Regulations 2017.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: Rakesh Dholiwar, 01263 516161 rakesh.dholiwar@north-norfolk.gov.uk	

1. Introduction

- 1.1 The Town and Country Planning (Brownfield Land Register) Regulations 2017 (BLRR) came into force on the 16 April 2017 placing a new duty on local planning authorities (LPAs) to prepare, maintain and publish a register of previously developed land (brownfield land) that is suitable for residential development. The register was first published, as required, in December 2017 and has been reviewed and published annually since.

2. What is previously developed land?

- 2.1 Previously Developed Land (PDL) is often called 'brownfield' land. The National Planning Policy Framework includes a specific definition:

'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. The definition expressly excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape¹.

3. The Regulations require that the Register must be kept in two parts. The Department for Communities and Local Government (DCLG) have published a prescribed format that all local authorities must use to publish their data.

- 3.1 The first part of the Register is the list of suitable brownfield land sites. Part 2, a sub-set of Part 1, is for those entries in Part 1 that the authority

¹ Previously develop land definition National Planning Policy Framework [NPPF: Annex 2: Glossary](#)

considers to be suitable for 'permission in principle'². Part 2 of the register is discretionary.

4. The Register

- 4.1 The North Norfolk Brownfield Land Register (BLR) has been prepared in accordance with the regulations and has been reviewed this year, for publication in December 2019. Sites may only be included on the Register if:
- (a) the land has an area of at least 0.25 hectares or is capable of supporting at least 5 dwellings;
 - (b) the land is suitable for residential development;
 - (c) the land is available for residential development; and
 - (d) residential development of the land is achievable.
- 4.2 In December 2018 the register comprised [Nine sites](#) in Part 1 of the register, consisting of 7 sites with existing planning permission (either full or outline) and 2 sites without. No sites were proposed for the granting of permission in principle.
- 4.3 This year, 5 of those sites from last year are retained on the register, as the circumstances have not changed and the other four have been removed. One has been identified to be below the threshold of 0.25ha and the other three sites have commenced development and therefore are not available.
- 4.4 In addition to the above, five new sites have been identified for inclusion on this year's Register: three of these are allocated sites, as identified in the Core Strategy and which are within settlements and the other two have permissions.
- 4.5 The Government has advised that local authorities should use existing processes to identify sites for inclusion in brownfield land registers. The main source of sites for consideration for the BLR has been the Council's Housing and Economic Land Availability Assessment (HELAA) which includes, but is not limited to, details of unimplemented planning permissions, allocated sites which are unimplemented, sites put forward through a 'call for sites' and land in local authority ownership. There is no requirement to undertake specific research with the objective of identifying *all* possible brownfield sites and consequently it is highly likely that other qualifying sites exist which are not included on the Register.
- 4.6 Sites that appear on the Register must be appropriate (suitable) for housing development (or housing led development), having regard to the criteria³ set

² See The Town & Country Planning (Permission in Principle) Order 2017 and the National Planning Practice Guidance 'Permission in Principle' - <https://www.gov.uk/guidance/permission-in-principle>

³ The criteria referred to in paragraph (1)(b) of regulation 3 (BLRR) are, in relation to each parcel of land—

(a) the land has an area of at least 0.25 hectares or is capable of supporting at least 5 dwellings;

out in [Regulation 4](#) of the BLRR. Local authorities are also required to have regard to the development plan, including relevant neighbourhood plans, and the National Planning Policy Framework when making decisions about which sites to include on their registers. This means, for example, that a site that complies with the definition of brownfield land but is located within an area designated as Countryside in the Development Plan would not appear on the Register as it would be judged to be unsuitable for residential development given that such a proposal would be contrary to adopted Development Plan policies.

- 4.7 The result of this process is that 10 sites have been entered into the Register (See APPENDIX 1). These sites amount to approximately 6.09 hectares of brownfield land with an estimated net minimum number of dwellings totalling 223.
- 4.8 Part 2 of the register is discretionary, inclusion of a site in Part 1 does not mean that it will automatically be granted permission in principle. The regulations set out the requirements for publicity and consultation where an authority proposes to enter sites on Part 2 of the register. There is no right of appeal where a LPA decides not to enter a site in Part 2 of the register and not trigger the grant of permission in principle. A person with an interest in a site has the option of submitting a planning application to the LPA in the usual manner.
- 4.9 Permission in principle is an additional tool that the Government has created and it must be carefully considered whether it is beneficial to use it, and if so where. The inclusion of sites on Part 2 of the register is at the Council's discretion and requires a clear, transparent and consistent approach. The regulations stipulate very precisely what matters can be taken into account when granting permission in principle, and which matters cannot. Crucially, unlike normal planning applications it would usually fall to the Council, and not the developer, to undertake any technical surveys necessary to confirm that a site is suitable and developable.
- 4.10 It is considered that there would be very limited gains resulting from establishing and undertaking the process required for sites to be included on Part 2 of the Register. Granting of permission in principle would be unlikely to lead to any significant increase in the number dwellings coming forward on brownfield land in the District. It is therefore considered that the resource implications (staff and financial) far outweigh any advantages of undertaking the process of granting sites in the register permission in principle.
- 4.11 Taking into account the above issues it is proposed that the Council does not progress with Part 2 of the Register at this time.

5. Recommendations

1. To publish the Brownfield Register with the 2019 updates.

-
- (b) the land is suitable for residential development;
(c) the land is available for residential development; and
(d) residential development of the land is achievable.

2. Agree to the recommended approach not to undertake Part 2 of the register.

6. Legal Implications and Risks

6.1 It is a legal requirement to prepare, maintain, review and publish the register annually.

7. Financial Implications and Risks

7.1 A new burdens grant payment of £14,645 for 2016/17; £5,485 for 2017/18 and £3,687 for 2018/19, totaling £23,817, has been received by the Council.

7.2 The brownfield land register must be reviewed at least once a year and therefore the process requires an ongoing officer commitment.

Appendix 1: Brownfield Land Register.

Appendix 2: Maps

Abbreviations

BLRR - The Town and Country Planning (Brownfield Land Register) Regulations 2017

LPAs - local planning authorities (LPA – local planning authority)

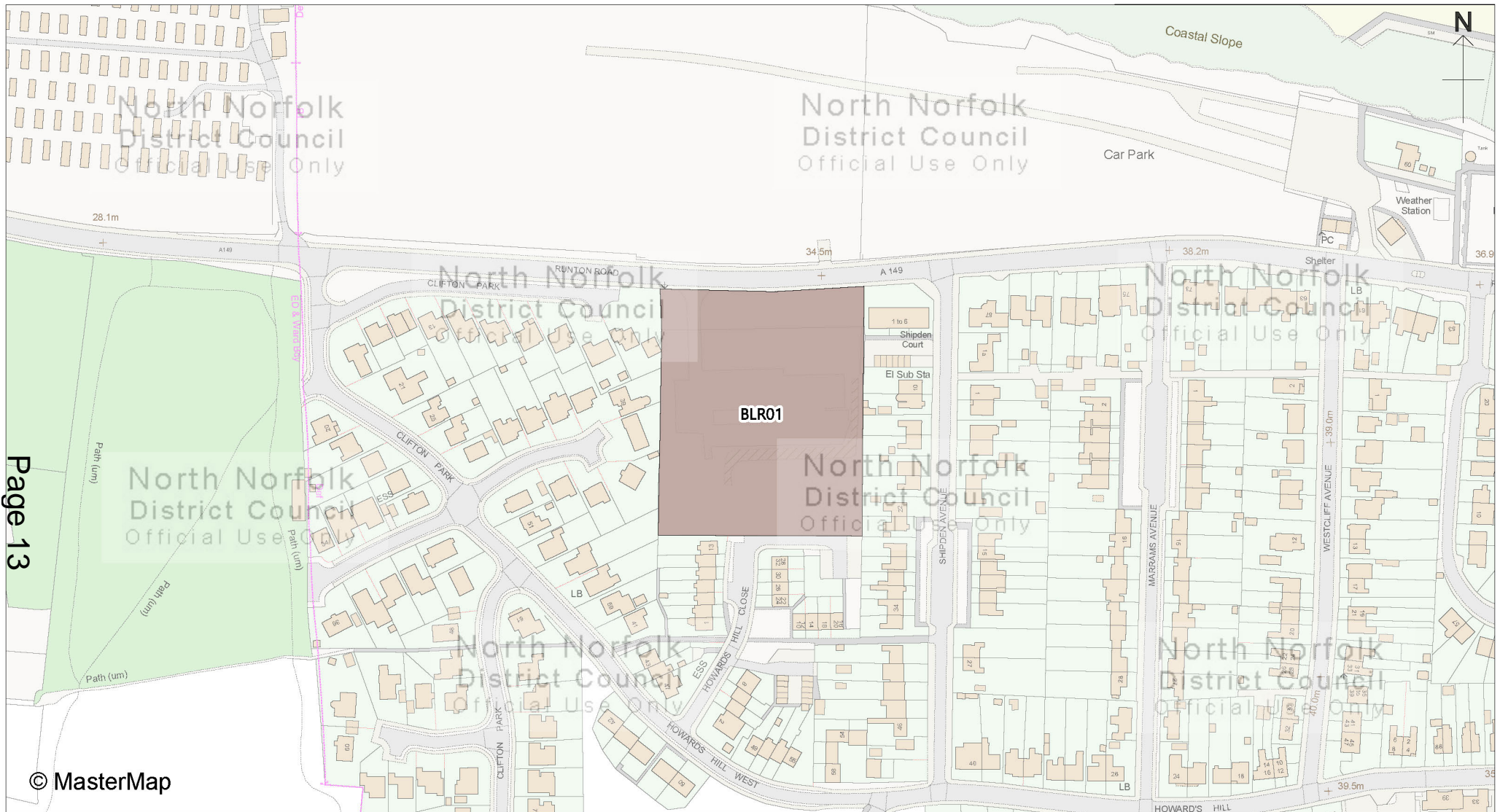
DCLG - Department for Communities and Local Government

BLR - North Norfolk Brownfield Land Register

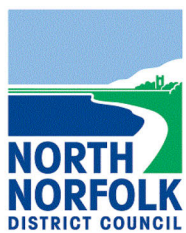
HELAA - Housing and Economic Land Availability Assessment

Reference	Application No.	Address	Source	Description	Description/ Location
BLR01	PO/06/0629	Land at Runton Road, Cromer	Outstanding permissions	Estimated capable of accommodating between 25-29 dwellings	Land at Runton Road Cromer (No. of unites based on 40/ha)
BLR02	PF/18/0909	Coach Depot, Claypit Lane, Fakenham	Outstanding permission	Not Commenced. Full permission for 7 dwellings. Expires 04/09/2021	Demolish existing/ erect new dwellings Sanders Coaches, Claypit Lane
BLR03	None	Maces Yard, 34-36 Cromer Road, North Walsham	Call for sites	Estimated capable of accommodating between 20-23 dwellings	Maces Yard 34 - 36 Cromer Road North Walsham (No. of unites based on 40/ha)
BLR09	PF/17/1939	Units at Old Coal Yard, Maryland, Wells-next-the-Sea	Outstanding permissions	Not Commenced. Full permission for 9 dwellings. Expires 16/08/2021	Demolition of grain store & erection of dwellings. Units at Old Coal Yard, Maryland
BLR10	PF/17/0468	Formerly The Shannoeks, 1 High Street, Sheringham	Outstanding permissions	Not Commenced. Full permission for 10 dwellings. Expires 06/02/2021	Demolition - New Dwellings Formerly The Shannoeks, 1 High Street
BLR12	C01	Land adjacent to East Coast Motors, Beach Road,	Allocation	Allocation for 40 dwellings.	Land adjacent to East Coast Motors, Beach Road
BLR13	C07	Land at Jubilee Lane / Cromer High Station,	Allocation	Allocation for 31 dwellings.	Land at Jubilee Lane / Cromer High Station
BLR14	ROS4	Land South of Louden Road, Cromer	Allocation	Allocation for 20 dwellings.	Land South of Louden Rd.
BLR15	PF/11/0487	70 Holt Road, Fakenham,	Outstanding permissions	Site is not being progressed.	Replacement Dwelling 70 Holt Road (Net Gain 5)
BLR16	PO/15/0539	Land to the north of Tilia Business Park, Tunstead Road, Hoveton	Outstanding permissions	Not Progressed. Outline permission for 28 dwellings. Expires 17/10/2020	Residential Development Land to the north of Tilia Business Park, Tunstead Road

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North Norfolk Brownfield Land Register (2019)

BLR01 - Land at Runtun Road, Cromer

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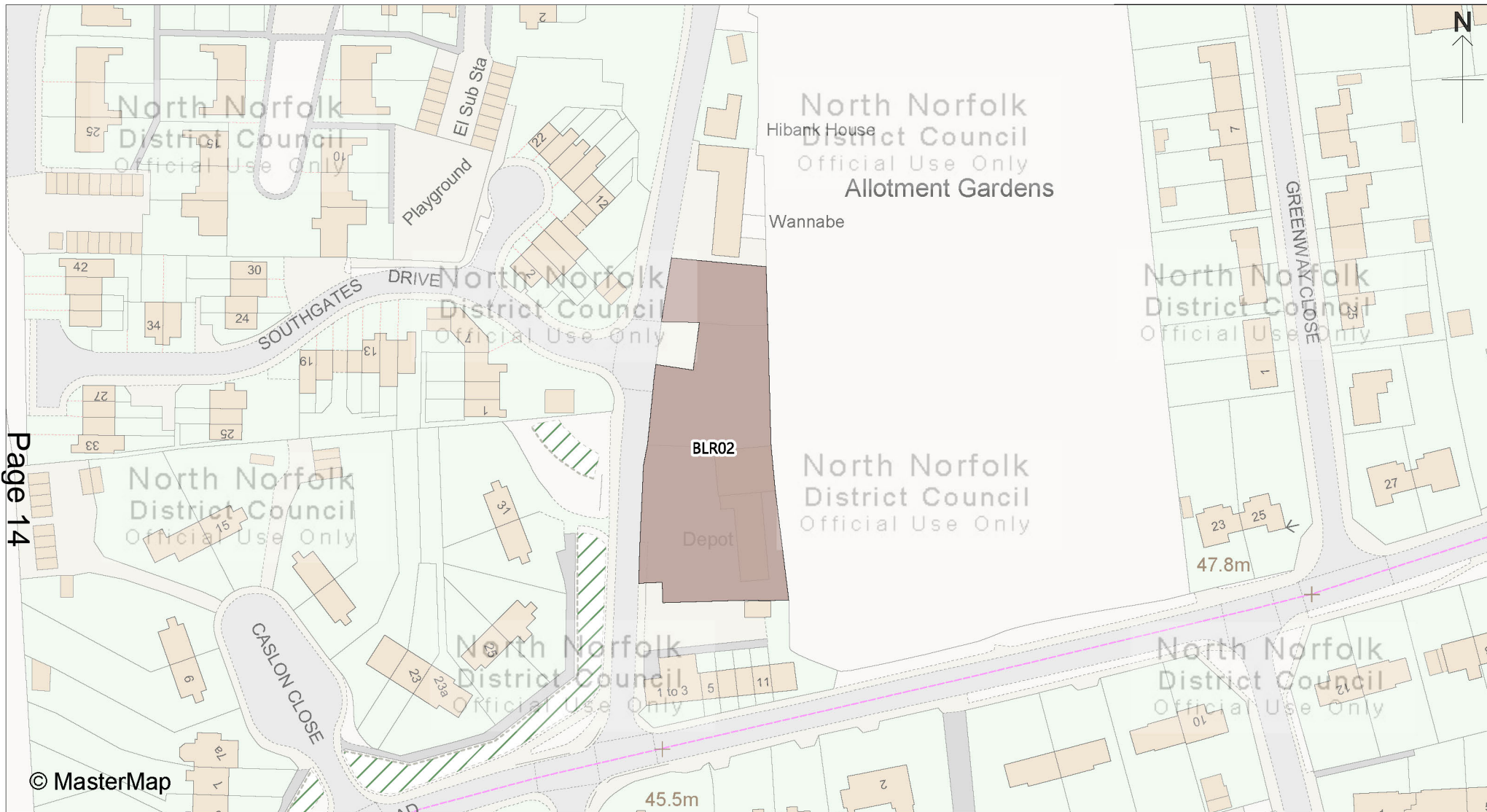
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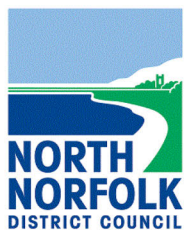
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North Norfolk Brownfield Land Register (2019)

BLR02 - Coach Depot, Claypit Lane, Fakenham

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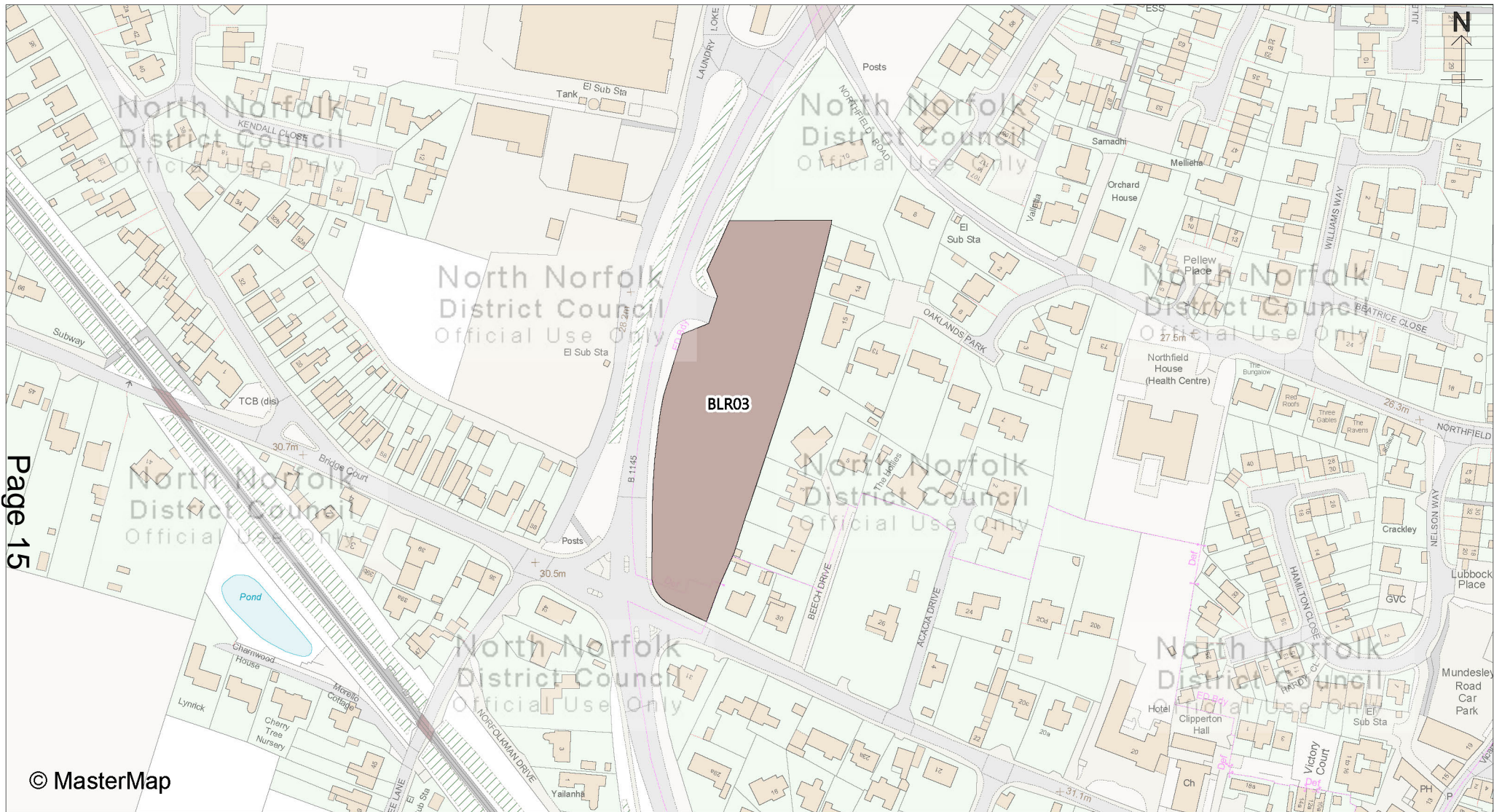
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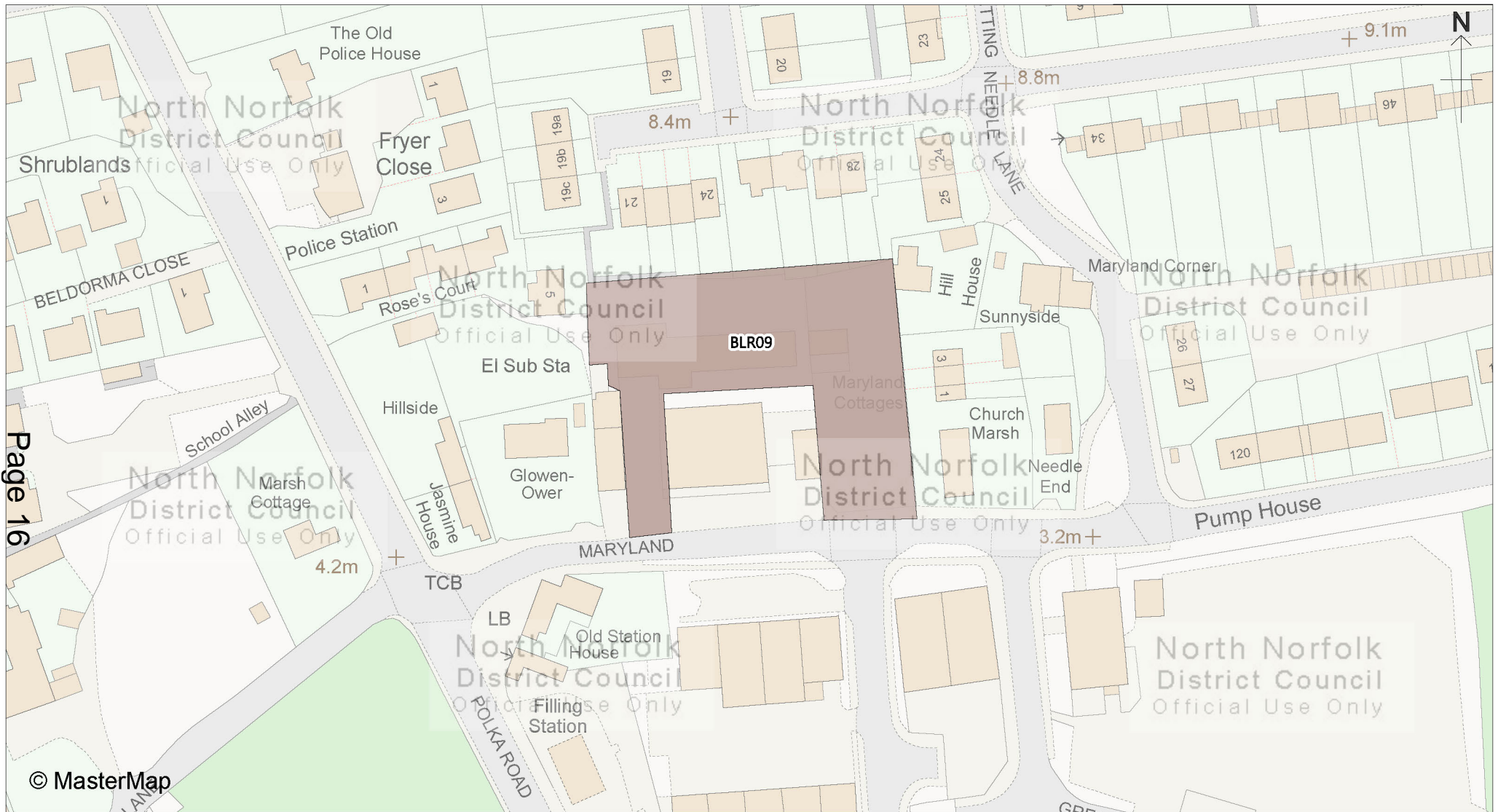
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North Norfolk Brownfield Land Register (2019)
 BLR03 - Maces Yard, 34-36 Cromer Road, North Walsham

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BLR09 - Units at Old Coal Yard, Maryland, Wells-next-the-Sea

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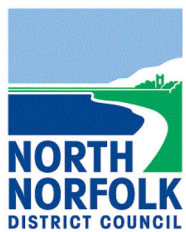
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North Norfolk Brownfield Land Register (2019)

BLR10 - Formerly The Shannoeks, 1 High Street, Sheringham

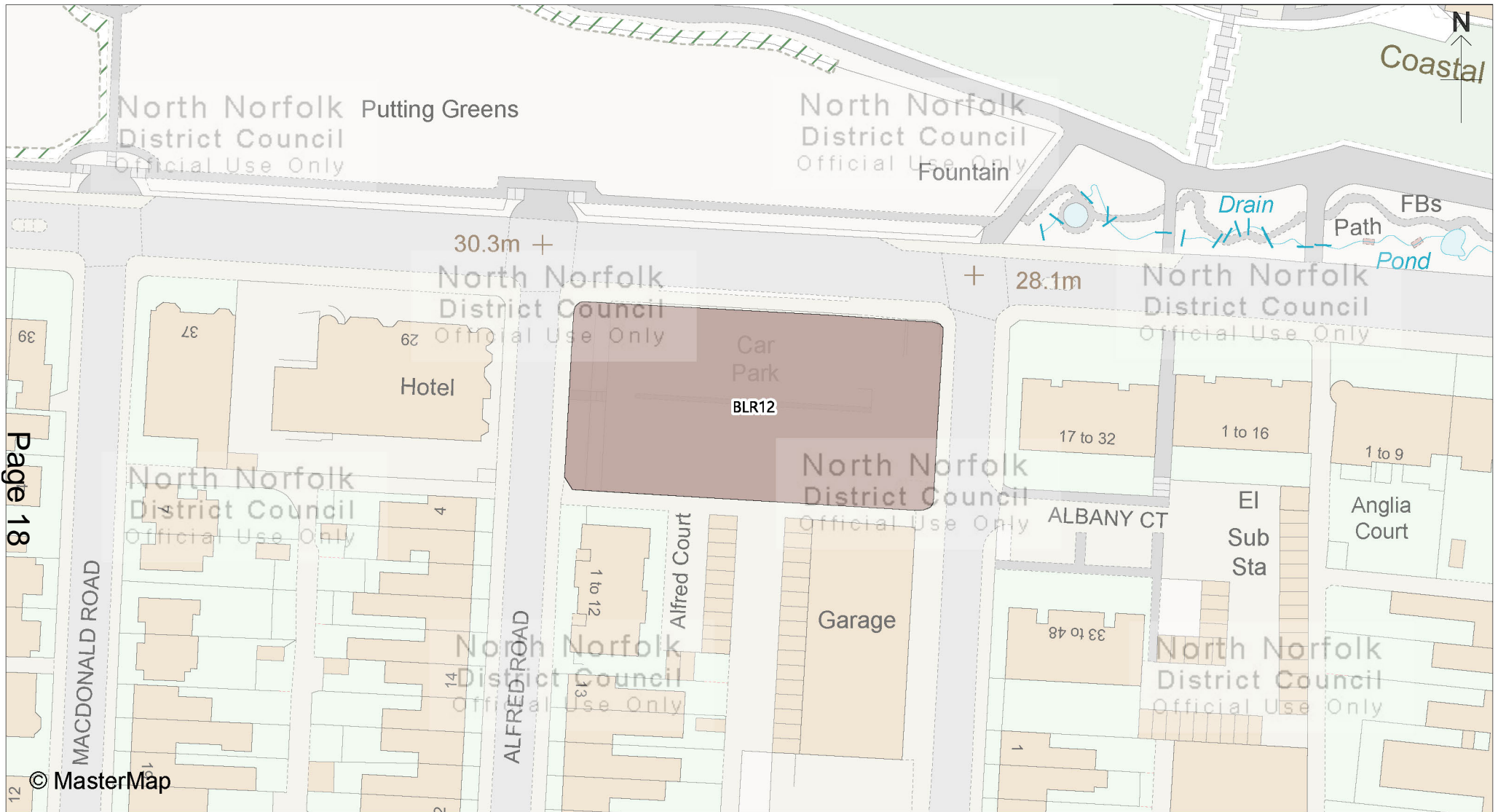
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North Norfolk Brownfield Land Register (2019)

BLR12 - Land adjacent to East Coast Motors, Beach Road, Cromer

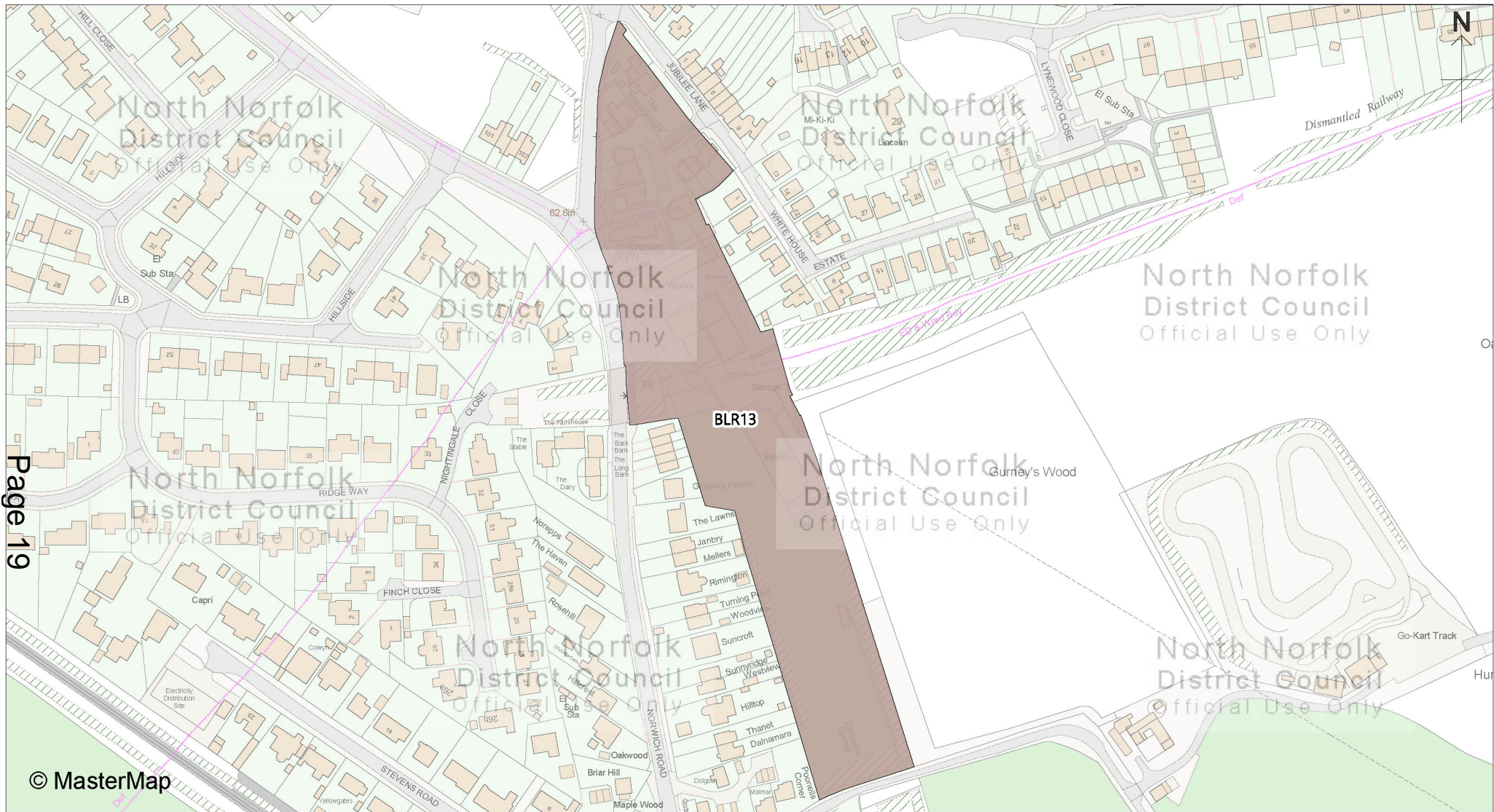
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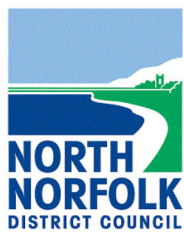
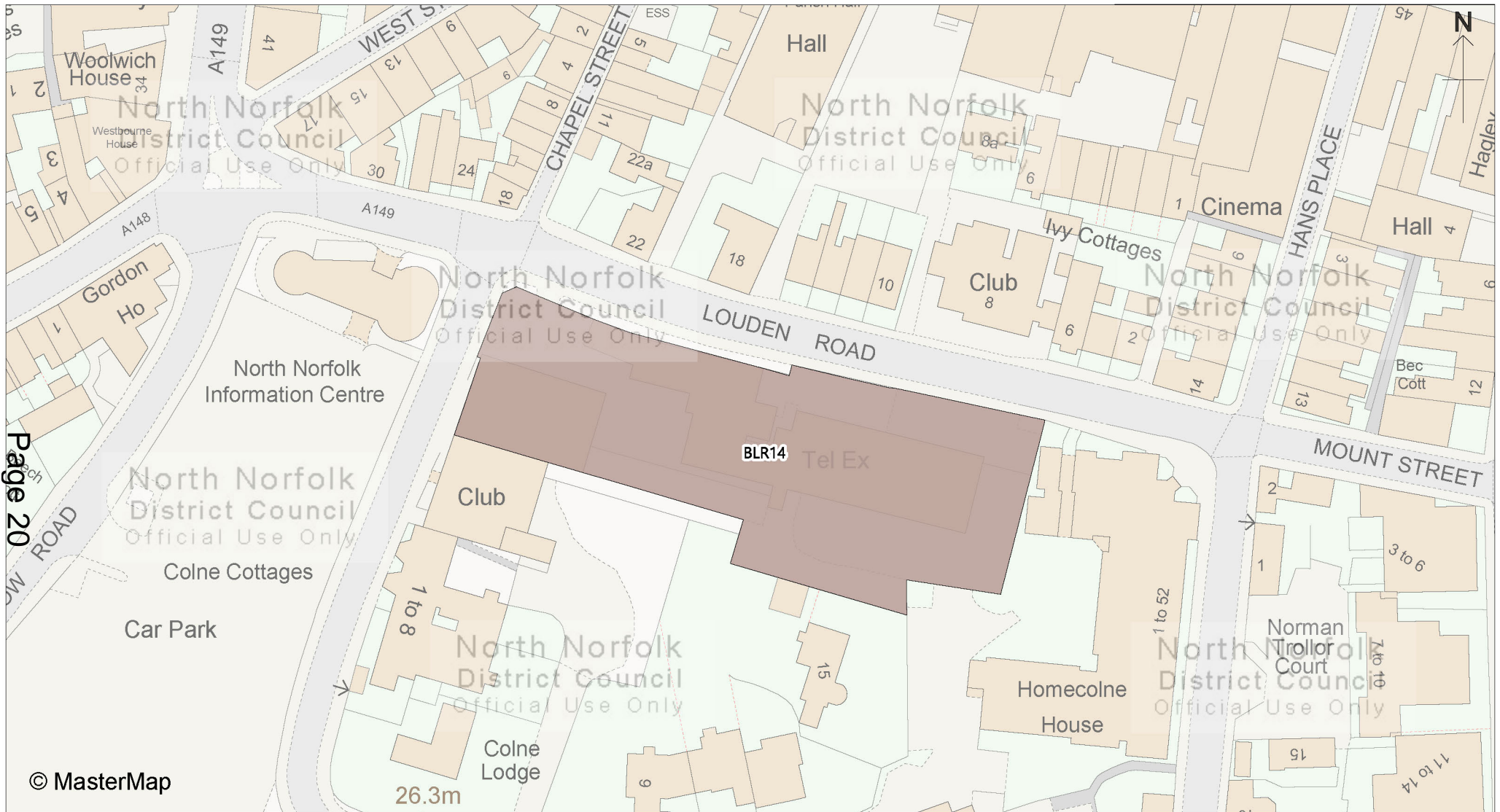
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North Norfolk Brownfield Land Register (2019)

BLR13 - Land at Jubilee Lane / Cromer High Station, Cromer

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North Norfolk Brownfield Land Register (2019)

BLR14 - Land South of Louden Road, Cromer

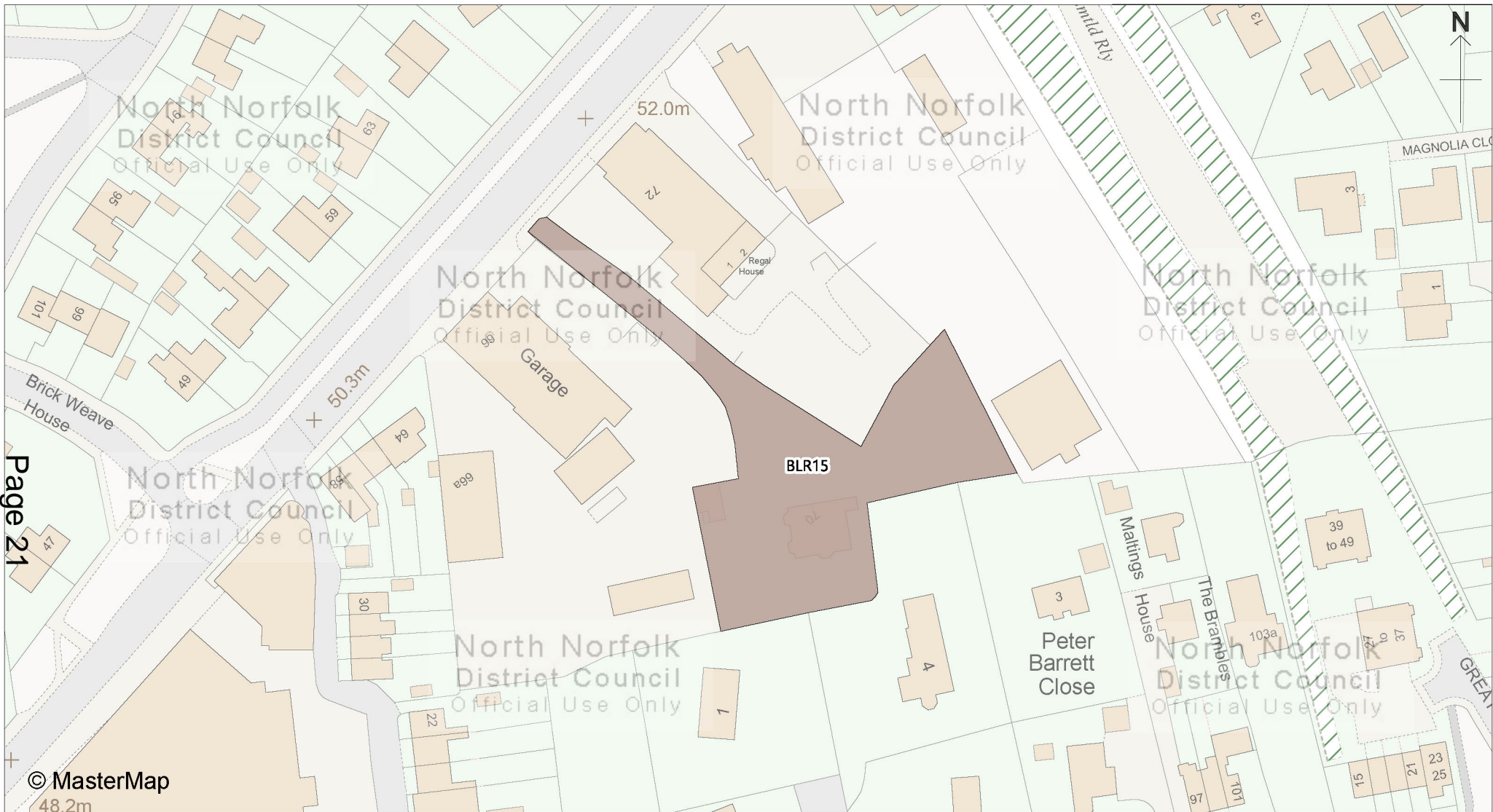
1:1000 CB

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North Norfolk Brownfield Land Register (2019)

BLR15 - 70 Holt Road, Fakenham

1:1250	CB
15/11/2019	

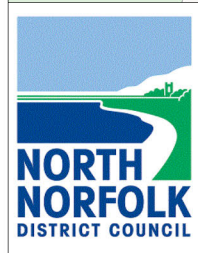
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North Norfolk Brownfield Land Register (2019)

BLR16 - Land to the north of Tilia Business Park, Tunstead Road, Hoveton

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LOCAL PLAN SCHEDULE OF REPRESENTATIONS – REGULATION 18

Summary: This report provides a precis of the responses received from the Regulation 18 consultation and explains the process for considering the responses as part of the finalisation of the Local Plan.

Conclusions: The feedback submitted as part of the regulation 18 consultation should be used to inform and assist in the preparation of the final version of the Local Plan.

Recommendations: **Members note the content of this report and delegate final adjustments of the Schedule of Representations to Planning Policy Manager and publish.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer(s), telephone number and email: Iain Withington, Planning Policy team leader, 01263 516034, Iain.Withington@north-norfolk.gov.uk	

1. Background

1.1 The First Draft North Norfolk Local Plan, the alternative options considered during its preparation, and Interim Sustainability Appraisal reports, together with a wide range of supporting and evidence documents were published and subjected to an eight-week period of public consultation over May and June this year under regulation 18 of The Town and Country Planning (Local Development) (England) 2012 Regulations. As reported to the July LPWP, 900 representations were received from 404 consultees. These responses covered a broad spectrum of policies and proposals with many covering multiple policy areas. Subsequent work has been undertaken to apportion each comment against a policy and or site proposal and a consolidated Schedule of Representations has been produced. The schedules form a dual purpose:

- a) To provide a summary of the comments in order to consider the feedback and main issues raised in the finalisation of the policies and proposals in the final version of the Plan.
- b) Provide a statement of fact as to the representations received and through further detail in the submission Consultation Statement assist in explaining how any representation made under regulation 18 will be taken into account.

1.2 There is no requirement to reply directly to each of the representations individually. It will however be necessary to show at submission of the Plan for

examination how comments made at this stage of the Plan preparation process informed the policies and proposals of the final Plan, both in terms of policy development and the allocation of future development sites. To that aim each schedule along with a summary of issued raised contains initial officer comments as to how the comment will be used to inform future iterations of the Plan.

1.3 The schedule provides a summary and breakdown of each representation categorised as 'objection', 'support' and 'general comment' for each separate policy area/site proposal. The Schedule is split across 5 appendices to this report:

- Appendix A – representations made by individuals;
- Appendix B - representations made by Parish & Town Councils;
- Appendix C – representations made by Organisations and Statutory consultees
- Appendix D – representations made on the alternative options considered.
- Appendix E – representations made in the Interim Sustainability Scoping and Appraisal Reports and Habitats Assessment Report, HRA

1.4 Each complete response in its original format remains available on the consultation portal.

1.5 Collectively the schedule contains 1341 individual representations:

- 595 individual (members of the public) representations
- 86 town and parish council representations from 15¹ councils
- 508 statutory consultees and organisational representations.
- 148 comments on the alternative options document.
- 4 comments on Sustainability Appraisal & Habitats regulation Assessment

1.6 At the time of the consultation a further call for sites was undertaken specifically for the identified small growth villages. Many land promoters and owners took advantage of this further opportunity and submitted a wide range of additional sites.

New Sites:

- 91 sites were proposed through the Call for Sites process
- 39 are new alternative proposals. (ie completely new sites) .
- 52 are existing sites with some or no variation in the site area:
 - 12 existing sites with no change in site area
 - 40 existing sites with a change to the site area

In addition, 21 sites were proposed through the **First Draft Local Plan & Alternatives Considered consultation documents**. These may include duplication of the numbers above as many will have also been submitted through the Call for Sites process - this detail has not yet been cross-referenced

¹ Town & Parish Councils who responded: Bacton & Edingthorpe, Cley, Cromer, High Kelling, Hoveton, Mundesley, North Walsham, Northrepps, Roughton, Runton, Sheringham, Southrepps, Upper Sheringham, Wells –next-the Sea, Weybourne

- 1.7 The approach to the assessment of such additional site suggestions will follow the defined site assessment methodology and accord to the distribution of growth set out in the final version of policy SD3.

2 Next Stages

- 2.1 The Council must now prepare a revised version of the Plan which will be then subject to a further round of public consultation (Regulation 19) prior to being independently examined by a government appointed Inspector.
- 2.2 It is proposed that over the coming months the Working Party will consider issues and associated policies on a topic area basis with the objective of agreeing the content of an amended Plan prior to further consultation. Unlike the last round of public consultation, the next version of the Plan should represent the Council's final view on how to proceed and be the version of the Plan which the Council considers to be a sound basis for independent examination. Comments made during the next round of public consultation are considered directly by an appointed Inspector as part of the Plan examination process rather than by the Planning Authority, with the Inspector assessing the Plan against a number of defined legal and soundness tests.
- 2.3 In considering the representations and determining the preferred approach there is nothing in the Regulations which prevents further rounds of public consultation should this be deemed appropriate and helpful in preparing the final Plan.
- 2.4 As part of this process various aspects of the supporting evidence and the site appraisal and sustainability appraisal processes will also require updating.
- 2.5 The intention is that the specific policy feedback will form part of future policy/ topic based reports and be included for deliberation in the finalisation of policy choices for inclusion in the final version of the Local Plan.
- 2.6 Each report will include the following:
 - A schedule of all the representations made in relation to the issue being considered including an officer summary and recommendation;
 - A covering report focused on the key issues raised, summary of National Policy requirements, reference to key aspects of supporting evidence a discussion of the merits of options which may be available and relevant sustainability assessments.

3 Overarching feedback: Key Policy Issues Raised.

- 3.1 Given the breadth of the Local Plan and the high number of individual representations made, it is very difficult to provide an overall summary. The following highlights are not intended to be comprehensive but they provide a snap shot, or flavour, of the more substantive issues raised. These issues along with the specific feedback for each policy area will be reviewed as part of the finalisation of the plan.

3.2 Vision and Aims

- 3.3 Many comments welcomed the references to the character of the area, but thought it would be helpful to draw out specific references to the natural and historic environment further and provided some useful suggestions. Specifically, Historic England, while supportive of the document wish to see references to more substantial evidence base such as heritage impact assessments and conservation area appraisals, where they advocated a topic paper covering the approach to the historic environment. Other organisations while supportive wished to see further context and stronger statements around climate change, habitat loss & fragmentation and specific references to the protection of European sites, such as Special areas of protection, conservation and Ramsar sites, and other protected areas along with the strengthening of text around coastal change, cliff erosion/stability and adaptation to climate change.
- 3.4 There was a recurring theme throughout the responses from the general public that the Draft Plan was prepared prior to the declaration of a climate change emergency and as such the plan did not go far enough and or emphasis the issue sufficiently. Statutory bodies however recognised the input and content throughout the document around climate change mitigation and adaptation. References to biodiversity net gain were strongly supported and references to habitat creation to achieve this encouraged, in green corridors and enhanced green infrastructure. Others were keen to ensure the contextual information acknowledged the links between economic growth, tourism and management of the environment and how development needs should be met

3.5 **Sustainable Development Policies**

- 3.6 The majority of comments that raised substantive issues focussed around key policies such as the settlement hierarchy SD3, Development in the Countryside SD4, Developer Contributions & Viability SD5, and Flood Risk & surface water Drainage SD10.
- 3.7 Settlement Hierarchy – the distribution of growth- countryside development.
- 3.8 There was no universal agreement in relation to the Distribution of Growth.
- 3.9 Concerns were raised around the requirements to locate town based growth in the AONB with statutory bodies advising of strong supporting evidence to justify choices in the SA and HRA. The principle of broadly focussing growth in and close to the larger settlements was generally supported, however the challenge was to ensure the Plan facilitates appropriate levels of growth in the correct locations and provide appropriate infrastructure. Some developers commented that focussing large scale development in North Walsham and Fakenham could lead to pressures on land supply in the short term and further allocations with a preference in the higher valued areas, instead of reliance on windfall should be made.
- 3.10 Proposals for growth in villages are particularly controversial with arguments both for and against development. The majority of public comments objected to growth in villages and countryside due to inappropriate infrastructure and highlighting climate change. The following PC/TC's objected to being identified as small growth villages: Bacton, High Kelling, Roughton & Southrepps & Weybourne. Reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small scale allocations

run the risk of disproportionate and unsustainable growth. There was general support for the opportunities rural exception policies brought from both public and development industry.

3.11 Organisations that responded however generally put forward support for market housing growth in smaller rural settlements, but for many different reasons. Land owners and promoters supported larger scale growth especially in higher valued areas in order to support rural economies and their development needs and sought the removal of the overall prescriptive and restrictive cap in footnote 21 as well as suggesting a number of further settlements which the council should include in the settlement hierarchy eg Great Ryburgh and some provided reasoning for the exclusion of others including recognising their commercial interests, others however used the opportunity to support the identification of smaller villages as in the policy through expressing support and analysis of service provision and local connections.

3.12 Those promoting estate management sought more flexibility and a policy commitment facilitating appropriate estate growth and the recognition of the role larger estates make to the District.

3.13 Developer contributions

3.14 Other issues raised included concerns around viability in relation to the Councils increased requirement for progressive infrastructure such as electric charging points and the requirement to ensure adequate full fibre to premises was in place prior to occupation. Many developers and land promoters requested clear requirements around obligations at the same time as wanting the Council to incorporate more flexibility in the policies application. Statutory bodies generally welcomed many of the policies and provided some useful suggestions on how to strengthen the policies and add clarity.

3.15 Environment Policies

3.16 Many of the policies were largely supported across the board and were seen as giving strength to the protection and enhancement of the landscape and settlement character. Natural England reiterated their position around requiring an enhanced policy approach around the protection of European sites while others also sought greater provision and incorporation of Green infrastructure, habitat creation and biodiversity net gain into development proposals.

3.17 Housing Policies

3.18 The majority of comments focused on the setting of the Housing target, HOU1 and the Housing Mix HOU2. Many individual commentaries indicated that the general public thought the housing target was too high and raised delivery concerns, lack of infrastructure and impacts on the landscape. Mixed commentary was received from statutory and organisations, with comments ranging from the target should be set as a minimum to comply with the NPPF. Some thought that the target should include a further uplift to address employment growth. Others however acknowledged the council's position brought on through the adoption of the Housing Standard Methodology and recognised the challenges that the preferred option would bring with regard to historical delivery rates.

3.19 Connected to the challenges around the numbers, the Council was also challenged around the reliance on large sites growth, commenting that the

approach provided little to no certainty that the housing target will be delivered and that the council was not identifying enough land for housing to ensure consistent rate of delivery. A solution suggested further consideration to additional deliverable allocations and a wider distribution / numbers of adequate sites, particularly in higher valued and rural areas and or a buffer of sites should also be considered.

3.20 Again the high reliance on windfall, rather than allocations was raised as a concern by some.

3.21 In relation the housing mix, HOU2. The approach seeking to increase housing options across a range of need was generally recognised and welcomed by statutory bodies and some developers (in relation to need). The disproportionate requirement for self-built was questioned. Many developers wanted greater flexibility in housing mix and more certainty in the type and tenure of affordable housing. For the Public the main concern raised was around supplying housing at a price and tenure that addresses local need with the provision for Low Cost Home Ownership reflecting actual levels of income within North Norfolk rather than levels of average income for England as a whole.

3.22 **Employment Policies**

3.23 Overall broad support was offered for the Economic Policies within the Plan. Town and Parish Councils identified potential modifications to the primary shopping areas in Cromer, North Walsham and Sheringham. Statutory Consultees provided the most substantive responses offering minor modifications to ensure further clarity to the direction of the policies. Individual responses argued for more flexibility in regard to the approach to tourism arguing for more rural and coastal development.

4 **Overarching feedback: key sites issued raised**

4.1 In regards to representations on sites, in general Statutory Consultees did not raise any substantive site concerns and provided more general comments around the principle of allocation. Statutory and organisations provided helpful comments around their aims and priorities and provided examples of where policy wording could be strengthened and or help address a specific site issue. Historic England requested that the Council undertake heritage impact assessments in relation to site assessments. NCC Highways and Lead Local Flood Authority (LLFA) initially raised a holding objection around their inability to respond to the technical requirements of site access and highway network during the consultation period. LLFA have subsequently removed their objection and an extension has been agreed with NCC Highways to work through the detailed site specific technical comments.

4.2 Although limited feedback there was general support received from the Town and Parish councils around the allocations with one or two exceptions including DS3, Clifton Park, Cromer.

4.3 A large number of objections were received from members of the public and nearly half were objections to the proposed site allocation at Clifton Park, Cromer. Comments raised a number of issues, including concerns over development on land which is considered to be a critical gap, a wish to retain the town and village boundaries, biodiversity and capacity concern at WRC.

- 4.4 There is general support for the proposed sites in North Walsham and acknowledgment for the need for a link road. Underlying many objections to individual sites, especially in North Walsham, are concerns about whether development is actually needed and how supporting infrastructure will be provided in a timely fashion.
- 4.5 Some developers however raised concern over the reliance on large growth in the lower values areas such as North Walsham and this could hamper the Council in the short term through restrictions on land supply. Respondents were concerned about the level of market housing which could be built on the sites in Wells-next-the-sea, and that it would not reflect their needs.
- 4.6 Members of the public raised concerns over the potential impact of development on the character of the countryside and on the character of settlements, especially in the coastal towns and villages. Also concerned about how large scale housing growth might undermine the character of the District.
- 4.7 Concern over major development within the AONB and some comments raised potential environmental issues for site DS8 Barons Close, Fakenham. General concerns over the lack of employment opportunities available and the additional pressure development could have on services including doctors and schools. Inadequate vehicular access, flooding and drainage, amenity impacts on adjacent home owners and impacts on wildlife and the tourism are recurring themes.

4.8 Alternative Options Considered

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

4.11 Sustainability reports and Habitats regulation assessment

- 4.12 Where comments were received on the interim SA and HRA reports they were supportive of the approach and assessments to date.

5 Recommendation

- **Members note the content of this report and delegate final adjustments of the schedule of representations to Planning Policy Manager and publish.**

6 Legal Implications and Risks

- 6.1 The statutory process requires records of consultation feedback and demonstration of how this has/will have informed plan making. The schedules will be included as part of the submission documentation along with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

7 Financial Implications and Risks

- 7.1 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.

Appendix

Appendix A – representations made by individuals;

Appendix B - representations made by Parish & Town Councils;

Appendix C – representations made by - Organisations and Statutory consultees

Appendix D – representations made on the alternative options considered.

Appendix E – Representations made in the Interim Sustainability Scoping & Appraisal Reports and Habitats Assessment Reports, HRA

First Draft Local Plan (Part 1)

Regulation 18 Stage Public Consultation

**Appendix A: Schedule of Representations -
Comments Submitted by Individuals**

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Appendix A: Comments Submitted by Individuals

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Notes

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

The following tables provide a summary of the comments submitted to the Council as part of the **First Draft Local Plan (Part 1)** document consultation. These comments were submitted by **individual members of the public** against a variety of proposed Local Plan policies. An additional table provides a combined summary of the comments, including the Council's response.

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

'OFFICER SUMMARY - SEE ATTACHED FILE FOR FULL SUMMARY:' This wording is used throughout the document. It applies in two scenarios where either:

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

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

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

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First Draft Local Plan (Part 1)

Comments on Proposed Policies

(Submitted by individual members of the public)

Sustainable Development Policies

Policy SD1 - Presumption in Favour of Sustainable Development

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD1	Woodward, Mrs Josephine (1217427)	LP602	General Comments	Clearer ' better definition of sustainable.
SD1	Bell, Ms Jane (1218416)	LP799	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: p. 45 Par. 7.7 I applaud the Council's decision to give priority to Sustainable Development and the Brundtland Report as set out in Par. 7.7. p. 89

Individuals	Number Received	Summary of Responses (Policy SD1)
Summary of Objections	0	None received
Summary Supports	0	None received
Summary of General Comments	2	Two comments received, support for priority given to Sustainable Development and the Brundtland Report, one seeks clarification on what 'Sustainable' means.
Overall Summary		No substantial issues raised. Support for sustainable development, but seeks clarification on what 'Sustainable' means.
Council's Response		Support Noted. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supporting ways. This includes an economic, social and environmental objectives as defined by the NPPF para 7 - 10.

Policy SD2 - Community-Led Development

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD2	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree - Community led development should be subject to the same scrutiny as any development for compliance with planning law and stated policy aims of the Council. Consideration in favour of these developments rather than those of external developers would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or policy.

Individuals	Number Received	Summary of Responses (Policy SD2)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy, Community led development should be subject to the same scrutiny as any development. Consideration in favour of these developments would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or policy.
Summary of General Comments	0	None received
Overall Summary		No substantial comments received or issues raised. Community led development should be subject to the same scrutiny as any development. Consideration in favour of these developments rather than those of external developers would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or policy.
Council's Response		Noted, giving communities a greater say and control in planning is a central aim of government policy. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

Policy SD3 - Settlement Hierarchy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD3	Arnold Mr & Mrs (1210694)	LP077	Object	The designation of small growth villages along the coast is objectionable given the lack of existing facilities, the absence of any plans to change that, the more than considerable distances from medical centres and places of work and the total failure to integrate the problems of climate crisis. Occasional references are made to 'environment policies' but these are a merely token response to the most fundamental problems of our time. The housing plan looks like the accommodation of private sector housebuilding agendas, with their emphasis on profit generation rather than on the meeting of social needs. Housing needs to be where it is most useful and the travel distances are least and these criteria will not be met by building in small coastal villages
SD3	Allen, Roy (1218469)	LP778	General Comments	Langham is listed as having a community shop. There is no shop. Langham is listed as having a post office in a community shop. There is no post office.
SD3	Carr, Mrs Elizabeth (1216730)	LP409	Object	<p>Building in small growth villages as identified in Policy SD3 has the danger of allowing 'urban sprawl' which results in East and West Runton becoming an extension of Sheringham and Cromer (which already have areas identified for development). When travelling the coast road from Cromer to Mundesley you are in Overstrand before you realise you have left Cromer and there is a danger that in Trunch in particular, but also in Southrepps, any development will eventually lead to the loss of identity of these individual villages. As a tourist, it is the green gaps between settlements that provide the interest</p> <ul style="list-style-type: none"> -re-designating Trunch as a small growth village is the thin end of the wedge as far as planning is concerned. -If all the development goes ahead in North Walsham and Mundesley as planned there is a danger that Trunch and Southrepps will no longer be identifiable as individual villages with their own unique characteristics. -Remaining as a countryside village gives greater control to the local community in 'exceptions' and providing social housing whilst still retaining its individual identity. Trunch has a conservation area at its heart so any new development would need to be on the fringes towards North Walsham, Southrepps, Mundesley or Knapton. -Changing policy to allow small developments of mixed housing in other countryside locations would energise those communities and would address the housing needs that removal of Trunch (and Southrepps) from the small growth villages designation would create. -Currently, Trunch has quite a low water pressure in the village. Any further development locally - in Trunch or in the surrounding areas will only increase that problem. The new sewerage plant at Swafeld will only reduce current problems it will not solve future problems caused by new housing developments. The infrastructure needs to be put in place before any development can reasonably be considered. -Mundesley already has a problem with traffic at school time and the doctors surgery there will be just as under pressure as those in North Walsham when new houses are built. Suggested alterations: Higher prominence for keeping villages as named in Policy SD3 as countryside villages, especially those on the coast and those within (or on the edge of the AONB) and by not allowing the current defined boundaries to be altered <p>Return Trunch to a countryside classification. Change policy so that smaller mixed/social housing can be developed within the countryside</p> <p>Build on brownfield sites and infill before looking at greenfield sites.</p>
SD3	Carr, Mrs Elizabeth (1216730)	LP428	Object	<p>re-designating Trunch as a small growth village is the thin end of the wedge as far as planning is concerned.</p> <ul style="list-style-type: none"> -If all the development goes ahead in North Walsham and Mundesley as planned there is a danger that Trunch and Southrepps will no longer be identifiable as individual villages with their own unique characteristics. -Remaining as a countryside village gives greater control to the local community in 'exceptions' and providing social housing

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>whilst still retaining its individual identity. Trunch has a conservation area at its heart so any new development would need to be on the fringes towards North Walsham, Southrepps, Mundesley or Knapton.</p> <p>-Changing policy to allow small developments of mixed housing in other countryside locations would energise those communities and would address the housing needs that removal of Trunch (and Southrepps) from the small growth villages designation would create.</p> <p>-Currently, Trunch has quite a low water pressure in the village. Any further development locally - in Trunch or in the surrounding areas will only increase that problem. The new sewerage plant at Swafeld will only reduce current problems it will not solve future problems caused by new housing developments. The infrastructure needs to be put in place before any development can reasonably be considered.</p> <p>-Mundesley already has a problem with traffic at school time and the doctors surgery there will be just as under pressure as those in North Walsham when new houses are built.</p>
SD3	Castleton, Mr Norman (1218485)	LP807	Object	There is far too much development proposed on green field and village sites. The services have not and will not keep pace with this and the environmental impact will eventually be catastrophic. Therefore, I cannot agree with the development of sites as herein proposed or with the developments of roads without due reference to public transport provision. Defences against flooding from the sea should also be consideration given the important nature of the Broads.
SD3	Walker, Mrs Kerry (1217345)	LP331, LP669, LP350	Object	<p>~In the new draft plan 2016-2036 Hoveton as a settlement has increased its hierarchy position to a 'Small Growth Town'. This is despite Hoveton being a village of 1800+ residents with a parish council, a village hall, a village sign and a separate district council.</p> <p>Concerns raised regarding Hoveton's place as a 'Small Growth Town' including:</p> <p>~Hoveton should not be considered together with Wroxham - considering the potential growth in Broadland and in the GNP</p> <p>~Concerns over the impact of traffic on Hoveton</p> <p>~Concerns over the air pollution levels in Hoveton</p> <p>~Concerns regarding the road infrastructure</p> <p>~Surface Water and Flooding</p> <p>~~Growth in Hoveton should be limited to 150 in light of the constraints and planned growth in neighbouring authorities.</p>
SD3	Witham, Mr I M (1216498)	LP205	Object	<p>Overdevelopment of Villages e.g. Southrepps. Suggested alterations: Higher prominence for keeping villages as named in Policy SD3 as countryside villages, especially those on the coast and those within (or on the edge of the AONB) and by not allowing the current defined boundaries to be altered</p> <p>Return Trunch to a countryside classification. Change policy so that smaller mixed/social housing can be developed within the countryside</p> <p>Build on brownfield sites and infill before looking at greenfield sites.</p>
SD3	Witham, Mr I M (1216498)	LP206	Support	Support the principle of development being targeted in designated settlements. Disagree with suggestions that the policy should be relaxed to allow market housing in smaller rural settlements. I do have concerns about the excessively large allocations being proposed for certain settlements, especially North Walsham, and also an excessively dense distribution of selected growth settlements in certain areas of the district. I agree with the overall approach, BUT I would seek an overhaul in the distribution of allocations across the district. There needs to be a much more even distribution between the allocations for selected towns. In particular, there needs to be a less excessive allocation for North Walsham. There should be a re-think of which villages are selected as growth villages, with a view to a less uneven spatial distribution of these, across the district.
SD3	Witham, Mr I M (1216498)	LP207	Object	Bacton should not be designated as a Growth Village owing to the particular character of the village and particularly the historically has a "scattered" or "dispersed" settlement pattern, characteristic of the north-east of Norfolk.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD3	Witton, Mr Edward (1216836)	LP241	Object	The Plan does not adequately promote sustainable development in rural areas (countryside) where it is needed to enhance and maintain the vitality of rural communities. Alter the "Countryside Policy" to provide for sustainable development within a settlement area. Changing the term "countryside" to "rural housing" as the term "countryside" is ambiguous.
SD3	Woodward, Mrs Josephine (1217427)	LP601	Object	The need to look at a better way to assess and provide for perceived housing needs.
SD3	Woodward, Mrs Josephine (1217427)	LP603	Object	Bacton, Walcott and Happisburgh should not be categorised as growth villages due to issues relating to 2nd homes, affordability, impact on infrastructure, public transport and traffic. Concerns over the approach for North Walsham and the proposed housing numbers, particularly 1800 on a single allocation. Reconsideration of Bacton, Walcott and Happisburgh as growth villages and a complete rethink of the appropriate number of new houses for North Walsham particularly the 1800 planned on a single site.
SD3	Young, Mr David (1210531)	LP051	General Comments	I had suggested that new-builds on greenfield sites in the Countryside should be allowed subject to a permanent residence status restriction. I had suggested that plots could be limited to 2 or 3 dwellings so as not to compete with plots for exception sites for affordable housing. I cannot see any harm in allowing such small infill, or even fringe, development subject to the normal considerations of design, overlooking and so on. On reflection I would also suggest that a permanent residence status restriction also applies in the chosen area to the brownfield sites mentioned at the end of Policy SD3
SD3	Edwards, Mr John (1216139)	LP320, LP322	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Wells-next-the Sea [Wells] is a small port located within a coastline designated as an Area of Outstanding Natural Beauty [AONB] which is increasingly impacted by a growing visitor economy. There has been a steady decline in traditional port, manufacturing and service employment and a steady investment in tourism and housing for holiday and second homes as well as inward migration for permanent residence. This has resulted in seasonally based employment and a significant distortion of the traditional local housing market. The classification of Wells as a Small Growth Town in the proposed Settlement Hierarchy does not reflect the special circumstances which the Town is facing. The pressures on the coastal settlements on the North Norfolk Heritage Coast are significantly different from those elsewhere in North Norfolk District, particularly with regard to housing, and are more aligned to the coastal settlements of Kings Lynn and West Norfolk District. Accordingly, the homogenisation of the Norfolk Heritage Coast settlements into the general policies of the Local Plan is inappropriate. This is particularly relevant to Wells and it is proposed that the Local Plan should focus, inter alia, on: <ul style="list-style-type: none"> Developing housing appropriate to the special requirements of the Town, Increasing full year employment opportunities, while Safeguarding and enhancing the AONB which is a major driver of the current local economy. The special circumstances of the settlements on the North Norfolk Heritage Coast be recognised in the Settlement Hierarchy, and the subsequent policies.
SD3	Hurdle, Mr David (901803)	LP065	Object	In 2nd bullet point of 7.20 replace 'reduce' with 'minimise'.
SD3	Swift, Mrs Julie. Swift, Mr Roger (1216911, 1217093)	LP242 LP271	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY Southrepps has already had planning granted for in excess of fifty dwellings in the past couple of decades and there is a current planning application in for a further 15 houses in the village. Much of the growth has been in 'estate form' with the largest being Beechland's (which is still growing) and more recently Drury's Yard. We have a mix of housing in 'Upper Southrepps' which includes two Housing Association allocations, holiday homes, second homes and privately owned (permanently occupied) homes. The village has a thriving community and has managed to maintain a shop and post office. The village is not stagnating. Southrepps is a 'rural' village with working farms,

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				<p>both arable and livestock. Its road network comprises of mainly single-track rural lanes - many with no pavements. Even the 'main' road through its centre is not capable of carrying two large vans side by side. The figures on the Parish Councils website from the new SAM2 unit are astounding – recording over 30,000 vehicles a month passing through the village in each direction. Further development in Mundesley will increase this further and so will further development in Southrepps. Further developments of up to 20 houses will put an intolerable strain on the road network in Southrepps and will endanger vehicular and pedestrian users of these roads. By necessity the sub-standard roads have to take farm vehicles, buses, oil delivery vehicles (as the village does not have gas), delivery lorries to the pub and shop. add to this supermarket and other delivery lorries for individual properties - the chances of two large vehicles meeting on the narrow roads are very high - at which point the roads get blocked with other vehicles queuing behind. It is incredibly dangerous and increases in traffic through the village will keep making it more dangerous. I, therefore, object to Southrepps being categorised as a small growth village as the roads cannot take anymore estate developments and the vehicles that would be created by this. It must be categorised as a 'countryside' village with development limited to under 5 properties. The change I am seeking is a re-classification for Southrepps from a "small growth village" to a "countryside" designation, thus limiting further development in the village. I would respectfully like to request a change of wording to point 2 to include 'or derelict': "Outside defined development boundaries in areas designated as Countryside residential development will be permitted only where it accords with other policies in this plan, or' 1. the proposal is for small scale development of typically no more than five dwellings; and, 2. the site comprises of previously developed or derelict land, and 3. development of the site would result in infilling or rounding off in a predominantly built up area. "This would allow such neglected plots (which are often local eyesores) to be put to the use of local families and the community where restricted public transport and plot size would make it unsuitable for affordable housing or agriculture. This seems to fit in to one of the key issues raised at Appendix 'Meet the planners' Event at Greenbuild 2017 at Felbrigg Hall (O: General Consultation Evidence) by local visitors that 'growth is wanted in smaller settlements. Policy of restricting growth only to large settlements is causing rural facilities to decline'. Also NPPF Making Effective Use of Land paragraph 118; 'Planning Policies and decisions should promote and support the development of under-utilised land' and 'support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'.</p>
SD3	Tickle, Miss Gemma (1217353)	LP373	Support	<p>I would like to request that in the smaller villages and predominantly built up areas outside development boundaries small scale sustainable development be permitted also on vacant derelict sites which are a blight to the villages, a waste for the community and could provide homes for families wishing to stay in the area.</p>
SD3	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP254	Object	<p>Paragraph 77 of the NPPF states that: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.' Paragraph 78 of the NPPF states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.'</p> <p>Policy SD3 does make limited provision for new development in Small Growth Villages. The policy states that: 'Small scale developments, including brownfield developments, community facilities and services will be permitted within the defined boundaries of the following Small Growth Villages.' Footnote 11 of the Plan notes that small scale developments are defined as infill development and new allocations of between 0-20 dwellings (to be selected in a Part 2 Plan). The policy goes on to note that: 'Outside defined development boundaries in areas designated as Countryside, residential development will only be permitted where it accords with other policies in this Plan. Or: 1. The proposal is for small scale development of typically no more than 5 dwellings; and 2. The site comprises of previously developed land; and 3. Development of the site would result in infilling or rounding off in a predominantly built up area.'</p>

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				<p>We strongly suggest that this policy is overly restrictive and does not comply with paragraph 16b of the NPPF, which requires that plans should be prepared positively, in a way that is aspirational but deliverable. It is respectfully submitted that, as drafted, the Plan does not go far enough in enabling villages in North Norfolk to grow and thrive. It is well documented that shops and services have closed in many villages in recent years; this Plan should provide an opportunity to reverse that decline and should not artificially restrict housing to infill or densification in Small Growth Villages which do still have a range of facilities and provide a relatively sustainable location for future growth. Instead, it should provide the opportunity for Small Growth Villages to grow and attract new residents. It should provide a more flexible policy context in which development can be brought forward. Specifically, the existing provisions of the Plan should be replaced by a policy which states that developments of 0-20 dwellings should be permitted on land adjacent to settlement boundaries, or sites which are close to settlement boundaries, and are in sustainable locations.</p> <p>We have reviewed the 23 Small Growth Villages identified in the Plan, and believe that generally sites of twenty properties cannot be accommodated in these villages, where the settlement boundaries are drawn tightly, there is little land availability and there has already been infilling and densification of the existing built form. It is therefore likely that, in order to provide approximately 20 dwellings within the settlement boundaries of each of these villages as required by Policy HOU1, several, smaller sites could be required. Development of several, smaller sites is likely to have a greater impact in terms of impact on amenity on the existing residents and is unlikely to deliver any scale of infrastructure which could make a meaningful contribution to offset the impacts of development. Indeed, it is likely that many of the smaller sites will avoid providing any affordable housing, if they fall below the thresholds for affordable housing provision proposed by the Council in Policy HOU2. We suggest that the Policy should be amended to make provision to allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings. This would help to conserve the existing urban fabric of the villages, and would allow some controlled, sustainable expansion of the Small Growth Villages, which, as identified in paragraph 7.24 of the draft Local Plan, have a number of services, and act as limited service hubs for other nearby villages, thereby complying with the provisions of paragraph 78 of the NPPF. On this basis, my client's sites should be considered for allocation in Roughton. Land north of Chapel Road lies to the west of the existing settlement boundary, in an infill plot between the existing properties along Chapel Road. The Plan affords the opportunity to review the existing settlement and include these properties and my client's infill site within the boundary. The site lies in a highly sustainable location, only some 600m from the village centre and is connected by an existing pavement, enabling residents to walk into the village. Land east of Norwich Road lies adjacent to the settlement boundary, which is formed by the A140, and also lies within walking distance of Roughton's shops and services, and bus stops on the A140.</p>
SD3	Fullwood, Mr Tony (1217463)	LP643	General Comments	<p>The classification of Wells next the Sea as a Small Growth Town is appropriate within the hierarchy of settlements proposed in the Local Plan. However, there should be recognition that Wells has a finite capacity which is defined by its infrastructure. This includes the pedestrian environment; roads, car parks and the natural environment. Staithe Street is limited in width and will not be widened; the pedestrian facilities around the quay result in conflict with motorists and cyclists and on and off street car parking lead to safety and congestion issues. The natural heritage, including national and international landscape and biodiversity designations, are precious resources which have finite capacity before the very essence of the place are destroyed. This is not a proposal for building/ widening roads or car parking as this will tip the fragile balance between development and conserving the finest attractions of the town and result in unsustainable development. Increasingly, the success of the town at attracting visitors threatens to diminish the very attractions that people have come to enjoy. There is a danger that too much expansion of the residential and visitor population will kill the goose which lays the golden egg. The fragile balance between development and the limited capacity of infrastructure and the built and natural environment at Wells should be</p>

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				acknowledged in the Local Plan and should result in an additional sub-category in the settlement hierarchy (Small Growth Town With Constraints) and by adding additional criteria to policies such as Policies ECN 6 and 7.
SD3	Tickle, Miss Gemma (1217353)	LP334	Support	I would like to request that in the smaller villages and predominantly built up areas outside development boundaries small scale development be permitted also on vacant derelict sites which are a blight to the villages, a waste for the community and could provide homes for families wishing to stay in the area. Request for change of wording of SD3 penultimate paragraph point 2 to also allow development of derelict sites outside of development boundaries.
SD3	Smith, Mr Anthony (1218514)	LP767	General Comments	On SD3, I agree with the criteria for residential development in Countryside areas outside defends development boundaries. Enforcing these criteria will help preserve the character of small villages, cherished by residents and sometimes quite fragile.
SD3	Mr Daniels (1217050)	LP263	Support	Recognises the benefits of allocating land immediately adjacent to built up areas, although this should ideally support sites with defensible boundaries rather than ribbon development which results in the coalescence of settlements
SD3	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. Designated landscapes etc. list of non preferred locations should include Greenbelt. Growth is most required where there are employment and services. Otherwise development in rural locations with little employment or few services only serves to generate additional car journeys. This is not sustainable and causes additional traffic, congestion, pollution and would fly in the face of the Council’s own stated environmental policies. The trend towards moving out of centres of development to rural locations and suburbs in the late 20th century is no longer appropriate given the environmental damage this has been shown to cause through pollution and congestion. Proximity of development and affordable housing to areas of employment and services such as healthcare, schools and public transport hubs must be encouraged if environmental objectives are to be met. That is why the alternative policies would not be appropriate.
SD3	Johnson, Mr & Mrs (1215700)	LP144	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: <ul style="list-style-type: none"> • Services in Little Snoring currently available do not fully meet the needs of the settlement. One small shop in village attached to caravan site which provides limited food range. Instead it is necessary to go to Fakenham. • The bus service is infrequent and quite limited. • There is no village hall. • The school is limited in capacity, has poor drop off and pick up provision. • Highways are generally narrow necessitating cars pulling over to allow passing and have limited capacity. Roads do not comply with modern standards. • Large vehicles use the village – cause difficulties with parking and traffic. • School bus blocks road when dropping off children. • Main A148 junction is of limited capacity. • Speed limit is 40mph more than many similar villages, making it difficult to get onto main road at busy times - further traffic movements would exacerbate this problem. • No development should take place without improvement of the junction and / or reduction in speed limits. Other access junction to A148 has speed limit of 60mph and an inadequate layout. • Broadband is nearing capacity and service would be impacted further, particularly those working or running businesses from home. • Limited capacity at Wastewater treatment works and parts have experienced problems with waste water. Quotes section 12.9.3 of current LDF – has network upgrade taken place suitable for additional housing? Surface water issues Kettlestone Rd – would be increased by further hardstandings. • It is not explained whether the desired allocation of 20 dwellings is in addition to sites already allocated but not yet developed? • Important that rural character of the village is preserved and that ribbon nature of village is not destroyed by infilling gaps with blocks of several dwellings between the roads and creating a single solid mass of housing. • Current mix of housing and green/open space within the village is very important to its character. • Preservation of green space is needed to maintain and encourage biodiversity and wildlife in the area. • Presently a good numbers of species of birds and flora in the village. • Green spaces and associated wildlife have a positive effect on the well-being of residents. • Development of natural or semi natural green spaces should be avoided. • In line with

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				<p>ENV1 to ENV12 any existing areas of pasture, woodland and green space must be retained as wildlife corridors and for local amenity and biodiversity. • Ideally development would be on various small plots rather than one large site of many houses which would have far more adverse impact overall. • Limited development can be achieved without having specific larger allocated site. Little Snoring should not be regarded as a " small growth village"</p> <p>Small infill development rather than allocating site.</p>
SD3	Johnson, Mr Jamie (1216384)	LP345	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whilst it is commendable that some infill/rounding off sites within established settlements/predominantly built up areas within designated Countryside is permitted, the reality is that as SA points out "due to the rural nature of the district, there are limited amounts of previously developed land". This is further enforced by the draft plan's settlement-specific Proposals 12-23 all of which (with the exception of Briston) are described as having "very little previously developed land' /'very modest infill which will not address need". With regards to this lack of available brownfield sites across the district and the NPPF stipulating in paragraph 78 on rural housing that "Planning policies should identify opportunities for villages to grow and thrive" and continues that "to promote sustainable development in rural areas housing should be located where it can enhance or maintain the vitality of rural communities" it would seem that a more flexible approach to small scale sustainable infill developments would be favourable. I would make a case that in line with paragraph 9.7, throughout the district on infill plots within established settlements/predominantly built up Countryside areas appropriate small scale development should be permitted on both available brownfield and greenfield sites, "provided no significant harm would be caused to the character or setting of the settlement or surrounding countryside" and "the scale of the scheme is appropriate to the location". This flexibility would also be in line with the NPPF's paragraph 68.c) which states "small to medium sites can make an important contribution to meeting the housing requirements of an area" and continues "To promote the development of a good mix of sites local planning authorities should: "c) support the development of windfall sites through their policy and decisions - giving great weight to the benefits of using suitable sites within existing settlements for homes". . NPPF para. 84. On 'Supporting a prosperous rural economy' further states 'The use of previously developed land AND sites that are physically well-related to existing settlements should be encouraged where suitable opportunities exist'. . NPPF 'Making effective use of land' paragraph 118 c) and d) also state that planning policies and decisions should "promote and support the development of under-utilised land" and "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" and I can see few local residents objecting to appropriate and sensitive small scale development of a site which lies derelict, despoiled or neglected and degrades its settlement as unsightly under-utilised land which could be put to good use for the benefit of the settlement and community. . Bearing in mind the above points and adding the Government's current 'Guidance for councils in how to consider rural housing policies' which states 'all settlements can play a role in delivering sustainable development in rural areas' and continues "and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence" would point to the fact that many smaller rural settlements are continuing to lose their local services and unless more flexibility is permitted for developments in the coming 20 years the trend for the loss of amenities, vitality and viability of these smaller settlements and villages will continue across the district. . The draft plan's vision for a 'thriving economy with vibrant and appealing towns and villages' in conjunction with the above points would seem to point to the fact that if smaller settlements and their communities and economies are to continue to be sustainable in this potentially economically uncertain time it would be a great and tragic loss if various infill sites in smaller villages and settlements which could not be used for agriculture lay empty and vacant, not making effective use of the land where they could be contributing to, enhancing and supporting the future of their settlement and it's community. Amend SD3 enabling increased support and flexibility towards appropriate small scale high quality development of infill/rounding off sites</p>

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				<p>within established settlements/predominantly built up areas in designated Countryside</p> <p>1. the proposal is for small scale development of typically no more than five dwellings; and, 2. The development is shown to enhance, respect and cause no significant harm to the character or setting of the settlement or surrounding countryside, and 3. development of the site would result in infilling or rounding off in a predominantly built up area.</p> <p>If this proposed iteration of criterion 2 is not considered acceptable then I would make a case for amending it to: 2) the site comprises of previously developed, derelict or despoiled land; and, . Evidence to support this is as above in addition to NPPF paragraph 118 on 'Making effective use of land' which states that planning policies should "promote and support the development of under-utilised land" and "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land "Exemplary highly sustainable commercially available 'eco tourism' holiday lets which comply with the plan's paragraph 10.50Holiday Occupancy and 140 day commercially available letting)</p>
SD3	Jones, Miss Debbie (1217499)	LP641	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I believe the wording to describe 'previously developed land' as 'defunct' and 'nonsensical' in the application of policy SD3 on which requirement '2' of: 'Outside defined development boundaries in areas designated as Countryside residential development' are concerned and thus should be changed or removed from the policy. Policy Glossary Dictates: Previously Developed Land OR Brownfield Land as 'Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.' The reason this policy makes no sense is that it is restrictive for reasons that do not align with national policy guidelines and are rely too heavily on subjective appraisal. - land that is or has been occupied by agricultural or forestry buildings *these are barns and you can't exclude barn conversions and haven't in the past. This has been re written to confuse and is irrelevant. Land that was used in the past does not mean it will in the future and should be considered on its merits 'in the now' and not the former. - land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures *provision for development for this land is already defined, it doesn't need to be excluded in this policy. - land in built-up areas such as private residential gardens *some residential curtilage is large but within a 'village', a 'built up' area. However, a built-up area is subjective and therefore unfair to be inclusive, it provides an unclear argument for subjective refusal outside of national policy guidelines. - Parks *fine but highly unimportant as there few parks in the countryside. - recreation grounds and allotments * subjective and unimportant in planning terms. If land was formally used for something recreationally for 'bike repairs' or 'keeping a few birds' or 'storing the weekend boat', it may not in the future have that required use and may not have been used for that purpose before it's former use, acquiring that use through time and which may very well never had planning for that use in the first place. It should be considered on its now merits and value for development. Land in villages is finite so it should have the opportunity to change. - And, land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time *if land was used for 200 years and then for the last 50 the earth has taken over, the desire to reuse that land in the future in a village or other may not ever go away, therefore why restrict its re-use in light of the fact land within village boundaries is finite. Pointless and will create further decay in villages. Villages are not chocolate boxes, they are communities that mostly still enjoy many of the same families for many generations. Excluding future development excludes future generations and breaking away from national guidelines will continue to be very damaging to the</p>

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				<p>structure, wellbeing, and future health and survival of villages. Since the last Local Plan adoption, the countries population has increased 15%. Villages in North Norfolk outside of defined development boundaries have not grown organically as they have done through history. In fact, by your admission in 9.5; second homes take up to 40% of sea view dwellings. Many villages have suffered the same fate as planning admits it can not control this. If there is only a provision in planning for the next 20 years for Travellers, Gypsies and low income families then it is very likely that villages will become ghost villages and services which are minimal will completely dry up. Local people need to be able to organically develop within their communities. My story can be used as an example. My village has 65 homes. My parents have 6 children. These children constitute 8% of the village population. With no new homes built in the last 20 years all the families in the village have lost the potential to retain family cohesion. None of the children now live in the village despite a desire to. There is plenty of land which is developable, my parents have no local support from their children or grandchildren without getting in a car. What's the result? We now have a shortage of farmers because there's no community left for them to relate and interact with, so why become a farmer... to be lonely! And there's no young people to work in the rural business, pubs and shop, tourist retreats, no one wants to get in the car and drive for 15 miles for 30 minutes at 11pm at night to get home on a low wage burning fuel which costs money. And finally, families have little support from children locally. They can't build a houses' close by and that's leading to a void in social welfare. It will be a downward spiral from here. If this rule is implemented it will be because the final decision maker thinks they are saving villages, but in fact you will be destroying them, the final nail in the coffin. It's time to halt the damage of the last 20 years. SAVE OUR VILLAGES.... PLEASE I would like clause '2. The site comprises of previously developed land' to be removed from the criteria. Remove clause 2 of policy SD3 'Outside defined development boundaries in areas designated as Countryside residential development'.</p>
SD3	Kloczkov (1210899)	LP094	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I have seen all the Barns disappear or become houses, no more Barn Owls, I have not heard the Tawny Owl yet this year, No more bats we used to have loads, no more hedgehogs if we are lucky enough to have one a year it will end up squashed as a whole family did last year, the roads are not made for the volume of traffic that goes through each day car and lorries through the day and night some times, more houses means more traffic more damage to the ozone, we only have one bus in the morning and one in the afternoon , there is nothing apart from countryside nothing for people to do unless they drive there is no work in the village as such you would have to travel probably to Norwich, so please recognise we are a village so change our status to Countryside as that is where we are and what we are. Give some thing back to nature and mother earth let common sense prevail, let our wild life have their homes and be able to live as they should. Use the empty houses and buildings not build more do them up use them. Southrepps should be designated as Countryside - use the empty houses and buildings not build more</p>
SD3	Lincoln, Ms Karen (1209571)	LP634	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Hoveton has once again been joined with Wroxham for the purposes of this document, yet they are huge differences in the two villages. Hoveton has all of the facilities, such as the shopping centre, train station, medical facilities, schools and a great deal of the commercial enterprises within it's two industrial estates. Hoveton has a great deal of the facilities for tourists which includes large areas made into car parks and the more 'tourist specific retail facilities, such as fast food outlets and cafe's and while that does bring into the village employment opportunities, it provided little else for the residents of Hoveton. The premise that traffic is a problem only in the summer months is flawed. Traffic jams and tail backs occur on a daily basis, on many occasions it is simply the volume of traffic using the road, on others a single car parked on the 'other side of the bridge' and more frequently of late, accidents on the bridge or broken down farm vehicles. This leads to high levels of pollution in certain areas of the village, particularly around the bridge area. Yet Hoveton has very few recreational facilities for residents, such as parks and open spaces and many residents avoid the 'shopping centre', choosing to shop elsewhere rather than fight for parking spaces or navigate their way over busy roads</p>

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				with only one real safe place for them to cross, or choke on the noxious fumes generated by traffic jams. Before bringing more people to the village, these things need to be redressed. The first and foremost traffic pollution and delays and secondly in giving residents areas in which to spend their leisure time and not have to fight visitors for a seat at granary staithe. No further housing development in Hoveton
SD3	Lincoln-Stubbs, Ms Valerie (1218556)	LP771	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Weybourne should not be a small growth village for the following reasons: a. Does not have an adequate bus service for working people, as the last bus in the winter leaves Sheringham at 3.30 pm. This also prevents children from staying to after-school clubs. b. The village shop has recently been put up for sale. No guarantee that it will be sold and its future is thus very much in doubt. c. Already has a high proportion of second homes and holiday lets. The likelihood is that new development would be beyond the price of local people, resulting in new houses also ending up as non-residential. Villages with high proportions of second homes/holiday lets suffer with a breakdown of the functioning of the community, and make it more difficult for local facilities to thrive. The Parishes development is a case in point, with none of the houses currently in residential use. d. Weybourne is in AONB. Increased development would negatively affect this, and this could damage existing tourism. e. The surrounding area is a haven for internationally rare migratory birds. Increased development risks reducing the habitat available to these birds. This would potentially conflict with international agreements to which the UK is a signatory. f. Parking in the village is already inadequate. Further development would increase pressure. 2. Any development in North Norfolk should put the environment at its heart, in view of the current climate emergency: a. All housing should be made of passive houses; use of insulation, borrowed light, air/ground source heat pumps, solar panels, wind turbines and the installation of electricity storage facilities (batteries) should be standard b. The use of green roofs/walls should be used to reduce the impact on habitat, as well as offering insulation properties, rainwater and carbon capture etc. c. Soft landscaping should be the norm, to improve habitat for flora and fauna as well as the physical and mental health of residents. In addition this brings the benefits of rainwater and carbon capture. d. Housing should be built where there is a specific need, rather than being foisted on local communities on a formulaic basis from central or regional government. There is no point in building additional housing in small rural areas where there is no local demand and limited employment opportunities. e. Services such as schools, doctors' surgeries, playgrounds etc. should be built first, to ensure that there are adequate facilities for the new residents and to prevent developers from later renegeing on agreements. Weybourne should not be a small growth village
SD3	Miles, Mr Richard (1216141)	LP166	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: By the redesignation 'countryside' areas, such as small villages into 'SD3' category you open the opportunity for inappropriate development which will continue to preclude local/young people from being able to afford property. All communities benefit from a mix of ages and backgrounds. Encouragement for the development of affordable housing by housing associations etc. can be achieved without risking opening opportunities for developers and wealthy groups turning villages into retirement communities. This is a risk if small villages loose their current status. The potential influx of older residents will require housing for 'lower wage' occupations such as nurses, care workers and police. Affordable homes reserved for these type of occupations can ensure a balance without commercially motivated development being the norm. Reconsider the need for small villages to loose their current designation of 'countryside'.
SD3	Miller, Mrs Pat (1210642)	LP121	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Accepted that further housing must be built in Hoveton but essential that it cannot put further pressure on the current, overstretched infrastructure. • Congestion along the A1151 and across the river bridge through Wroxham and Hoveton is now a daily issue and cannot be associated with the holiday periods alone. Deliveries, parked cars, bin-lorries, road works etc. etc. quickly cause substantial hold-ups at many times during the day on the majority of days. • The schools appear to have the capacity to expand and this will, hopefully, happen in line with the

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				<p>growth in housing and demand. • It is of great concern that the medical centre may not have the capacity to cope with an increased level of demand. This will not surprise any current resident since it is already extremely difficult to get an appointment within a reasonable time frame. • It is essential that an acceptable foul water drainage strategy is put in place for any new development in Hoveton and that Anglian Water can guarantee that it will not cause any further problems when the existing foul water sewerage network is surcharged due to rainfall. All demands on the infrastructure of Hoveton will be further increased by any developments in Wroxham. Whilst it states in the Draft Plan that any proposals that the Broadland District Council consider for Wroxham will take account of the suggested development in Hoveton, any development in Wroxham will have a substantive impact on Hoveton's infrastructure. How will the NNDC ensure that they are able to meet these additional demands? accepted that further housing must be built in Hoveton but essential that it cannot put further pressure on the current, overstretched infrastructure.</p>
SD3	Needham, Mr Colin (1216785)	LP269	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Fully understand that there is a need for additional housing in the district and that land has to be made available. The designations of growth points is reasonably well argued in the documentation. However, the process of considering each community in isolation is flawed especially with regard to the impact of growth in community A on adjoining communities B,C,D.etc...For example, current developments under the existing plan in Mundesley have had a direct and measurable increase in the traffic (commercial and private) passing through Southrepps. The volume of traffic is now adversely effecting this community. Our road is narrow, has no pavements and is considered by many to be dangerous such that people get in their car to go to the village shop rather than run the gauntlet of parked cars, heavy lorries and nose to tail cars. Baseline traffic flows are dramatically boosted by holiday traffic especially during the summer and this is a impact that the consultation document suggests that holidaymaking will be encouraged as a positive driver for economic growth in the district. Any further increase in the housing allocation in for example Mundesley, generating commercial and commuter traffic through Southrepps will have consequences for Southrepps and other villages on the B1436. Should include detailed consideration of the impact of site allocations on adjacent communities. Specifically the adverse impact of increases in commercial, commuter and leisure traffic. If such developments can be properly justified, consideration should be given to mitigation and compensatory measures such as highway improvements, footpaths and cycle ways in all the effected communities.. Developers and landowners benefiting from land allocations should be the principal contributors to the cost of these measures.</p>
SD3	Pope, Mr & Mrs G (1218477)	LP787	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Fakenham does not have the capacity to employ and service the number of people that could be involved.</p>
SD3	Rahner, Ms (Dr) Chris (1217315)	LP324	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Having considerable landscape constraints to accommodate much growth, it seems astonishing that Cromer was identified as a Large Growth Town for 'large scale growth'. Unlike North Walsham or Fakenham, a considerable part of the town's income is derived from the tourist industry, and for this it is dependent on the care and preservation of its character, the designated AONB and also the adjacent areas/ landscapes visible from the AONB. As the Plan (12.2) acknowledges, these non-designated areas are important to the landscape setting of the town. In addition, the NPPF states 'that great weight should be given to conserving and enhancing scenic beauty ...' and views from any point of an AONB, this great asset of which Cromer can be justly proud, would certainly be included in this statement meant to protect the town from large and/ or unsightly developments.</p>
SD3	West, Dr Louisa (1210536)	LP061	Object	<p>It is already very difficult for local residents to drive through and to Melton Constable. The village provides the doctors, school and shops used by local residents, including the surrounding area. No increased development should be allowed until additional parking and access routes bypassing the old part of the village are provided. The village and surrounding already</p>

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				suffers pollution from the traffic and industrial area. No further development till additional parking and access route bypassing the old part of the village are provided.
SD3	Wheldon, Ms Ginny Wibberley, Mr Chris (1216703 1216702)	LP214 LP301	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Mundesley requires affordable homes for existing residents and young people wishing to purchase their first home. There isn't a need for more 'executive' style homes that are well out of the price bracket that locals can afford. Building 8 'affordable' houses will make little difference to the housing need in the area and the remaining 42 houses will attract second home owners and those wishing to buy holiday lets, this contributes little to the area. At the presentation your NNDC rep stated that new jobs will be created in the area and that the NHS will be contacted to ensure that sufficient resources are provided for the GP surgery - where will these extra jobs spring from? How will the NHS resolve the issue of our GP surgery currently being 2 Doctors down on it's quota and unable to recruit? Another potential 200 people moving into the village is going to stretch resources to breaking point. The plan is ill thought out as it is not sustainable. The village does not have the infrastructure to support a further 50 properties. The village school is I believe at or close to capacity. Only affordable housing should be built in Mundesley. Small developments of affordable housing around village which will fit in with existing community without negative impact.
SD3	Williams, Ms Katie (1209757)	LP009	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: SCHOOLING / EARLY YEARS: Ensure sufficient primary and secondary school places are made available from the point at which residents start living in the new homes. There should be no staged introduction to school places - places should be made immediately available for new local residents so parents do not have to cope with the stress of transporting children to out of village schools whilst also having to manage their own commutes to work. Following the publication of data on primary school entrance places in NNDC, it should be noted that Hoveton St John Primary School filled all 30 of its available places in 2019 and had to refuse 6 applicants. Given that a new development of 25 houses is already in the process of being built in Church Fields (which, by conservative estimates, will inevitably be home to at least several primary aged children), this situation will only get worse. Expanding the primary school therefore seems not only a logical, but an entirely necessary, step to meet demand. It is also necessary to consider secondary school places at Broadland High School. At the moment that school only teaches up to 16 years of age, but given the new influx of children through Hoveton's expansion (as well as Wroxham's allocation of new houses which has to be simultaneously catered for), this cut off warrants serious consideration as otherwise any young person wishing to stay in full time education beyond 16 years will need to travel into Norwich. This is create additional stress on Wroxham Road as those children will either depend on family members driving them into the city or catching local transport. I also believe that given the growth of the village, greater provision needs to be made for young children aged 6 months to primary school age. In my opinion, the current size of the nursery linked to Hoveton St John is insufficient to meet demand. I personally have to drive my son to a nursery in Spixworth three days a week so I can access childcare that starts early enough and finishes late enough to allow me to work a normal working day. MEDICAL CENTRE: Similarly, capacity at the Hoveton & Wroxham needs to be increased to meet the growing demands placed on it. I am sure with careful planning this can be achieved as the facility certainly seems large enough from a lay person's perspective. ROAD ACCESS: Stalham / Norwich Road (especially over the bridge) is already arguably at capacity during the peak summer tourist months. Any road works that need to be carried out should only be allowed to take place during the late evenings and through the night as otherwise the disruption is colossal and in my view entirely unacceptable for existing residents who have had to queue in excess of 30/40 minutes to get over the bridge. The answer is not to push drivers to take the detour via Coltishall, as all that does is create problems for that village, but to get a handle on Hoveton & Wroxham's own traffic bottleneck. Ultimately a by pass would be the answer, but clearly that comes at huge expense. TRAINS: Given the number of new residents who will be joining Hoveton and Wroxham, I think a review of the frequency and carriage numbers of trains travelling towards Norwich is warranted, especially as some of the other towns requiring to take new homes

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				are also on the same line. It is very likely that a significant proportion of the new residents will find employment in Norwich, so we should try and promote train use wherever possible to free up the roads. BIKE SCHEME: One viable way to get people to travel around the local area more, rather than depending on their cars so heavily, is to create a 'Boris Bike' type scheme with drop off hubs dotted around the wider area (including a large one at the station). This would obviously necessitate having to invest in good cycle paths, but I do think there would be a good deal of traction with tourists, plus it would be environmentally friendly. Broadly support this site , careful consideration and planning should be made to alleviate the increased demand on public services. It is my firm belief that development should only be able to commence once provisions to increase capacities at local schools, GP surgeries, dentists etc. have been firmly committed to. Development in Hoveton should in essence be conditional on securing these commitments to improve public infrastructure before construction work on the new houses can start.
SD3	Wilson, Mr Iain (Hill, Mr Iain Bidwells) (1217197 1217161)	LP305	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <ul style="list-style-type: none"> • Supportive of allocating sites for small scale development • No detailed explanation is provided to why Edgefield has not been selected as Small Growth Village • Methodology is flawed • Fails to recognise that settlements, such as Edgefield are within close proximity to higher order settlements • Methodology restricts the ability of these settlements to grow, approach is unsuitable and unreasonable/ contrary to NPPF – para 77 . Growth would help maintain the vitality of rural communities. • Small Growth villages have been selected on service provision prior to site-specific constraints being considered -can the identified small growth villages accommodate the proposed growth? • Suggest that a broader range of settlements is identified , including those which are in close proximity to higher order settlements, to enhance their vitality. • Edgefield should be identified as small growth settlement • A bus is available to Holt which is 3 miles away which provides a range of services and amenities, including school • Edgefield is located on the main road (B1149,Norwich Rd) which provides connectivity and has a public house, meeting place, vehicle repair shop and a place of worship. • The Pigs provides employment opportunities. • Recommend that land off Plumstead Road is allocated for residential development. The site, which extends to 2.3 acres (0.9 ha) is entirely deliverable, and capable of making a contribution towards satisfying the Council’s housing needs during the period to 2036. Edgefield should be identified as small growth settlement <p>Recommend that land off Plumstead Road is allocated for residential development.</p>
SD3	Sanders, Ms A (1217671)	LP661	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative housing solutions should be sought away from existing towns and certainly from tourist assets. It is very short-sighted to insist that current infrastructure, already at a breaking point, can forever support the never-ending addition of yet more people, houses and cars. There comes a point where the decision has to be made to create new settlements and new roads, which should link up to the major arteries (A149, A140) south of town (in the case of Cromer). I understand this decision is unpopular with the Council because of the cost of road building and necessary amenities, but unless this decision is taken, life for the current residents will become more and more unpleasant, with barely working infrastructure caused by continuing densification, ever increasing traffic, ever increasing journey times, and fewer attractive spaces near town. As long as the Council still has the aim to make Cromer 'grow' (as per development plan) - an aim that seems to me at loggerheads with being a holiday resort - its decisions are bound to boomerang on its tourist industry, and on the future of our children. Alternative housing solutions should be sought away from existing towns</p>
SD3	Binks, Mrs Susan (1217821)	LP667	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: North Walsham is full already! Many times the roads are completely blocked around the town and beyond. The car parks are also often almost or completely full especially in the</p>

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				summer. At the doctors you have to wait ages for an appointment and cant get a dental appointment. There should be no development on this particular site.
SD3	Mr and Mrs T Davies (1218476)	LP786	Object	With reference to your plans to consider Little Snoring in the category of 'small growth village' I'd like to make the following observations: • Further development in the village (beyond that already planned) is likely to be into open countryside (as the current planned development already falls into this category) and this will have an adverse impact on the landscape, including look and feel of the village • The amount of social housing in the village is at a high ratio already • Further development will cause an impact on wildlife in the area • You suggest 'small growth villages' provide amenities for that villagers. We have a severe lack of facilities within this village – a pub (which has changed owners a number of times in recent years and is therefore not a particularly stable business) – a shop (which provides only basic items e.g. milk and bread) to service the campsite, not the villagers – full provisions need to be purchased in Fakenham • The Bus service is very infrequent • There is no adequate village hall (unlike other small villages) – only a prefab which is not a suitable or pleasant environment for villagers to meet and run social groups • Many of the streets within the village are mostly only passable by one car in each direction • The pre and junior school are both very small We ask you to reconsider your plan to include Little Snoring in this category – or provide sufficient investment in this village to satisfy your own criteria.
SD3	Mr and Mrs L de Soisson (1217257)	LP307	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: deletion of Southrepps from Small Growth Village category
SD3	Mrs Margeret Deeley (1209828)	LP014	Object	Whist I support the need for housing and also affordable housing in Briston for local people, after visiting the roadshow on the Local plan at the Briston Pavilion Thursday 9th May 2019, I have to say I am most concerned at the level of development planned for the village. 80 houses either side of Astley School – that is going to mean 80+ cars exiting onto the Fakenham road which already struggles at peak school time. Unfortunately, big lorries thunder through our village on their way to the farms and associated services. I know I was told that parking will be addressed but people will want to park outside their homes. At peak times, it is difficult to negotiate past Astley school – I agree that the pull in bays help, but it is still an issue. There is also the issue of only having a footpath on one side of the Fakenham road. As a resident, I already struggle to get a doctors appointment in Briston, mostly having to travel to Holt for a doctors appointment. I appreciate the developer will contribute to health facilities – but an extension to our local surgery is going to be a problem as there is no room to expand. North Norfolk is a huge tourist destination and the attraction is the small picturesque villages, of which Briston is one, visitors do not want to travel through identical over developed villages - we are about to destroy this with these plans. I am so unhappy that farmland is being considered for development – destroying our beautiful countryside which is one of the reasons we moved to Norfolk 10 years ago – we came from Essex – development there was appalling – no green spaces left! NNDC has recently approved planning permission for 10 houses off the Lane in Briston behind Holly House, this is then upping the amount planning to be built to in the time period to 90 houses. I appreciate the issues need to be addressed, but can Briston really support 90 houses without destroying the character of our village? I think not
SD3	Burns, Mr David (1216064)	LP157	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Trunch is designated 'countryside'. The implication of potentially losing control of boundaries and future development within and outside of them. Trunch as an important 'Conservation Town' with important buildings important sites of historical nature , limited facilities such as pavements, street lighting (only 4) should remain within the countryside category. Does not effect obligation for 20 houses for 2036 but ensures boundaries, allows some input in then nature of any development and the target of such development i.e. low cost housing for local young families such as recent positive developments. Tat Trunch remains within designated Countryside, this may mean it achieves more affordable houses.

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SD3	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP658	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Policy SD3 states that: ‘Outside defined development boundaries in areas designated as Countryside, residential development will only be permitted where it accords with other policies in this Plan. Or: 1. The proposal is for small scale development of typically no more than 5 dwellings; and 2. The site comprises of previously developed land; and 3. Development of the site would result in infilling or rounding off in a predominantly built up area.’ We welcome the principle that small scale development is proposed to be permitted in the open countryside, and recognise that the policy seeks to allow appropriate, organic growth of villages. However, we strongly suggest that this element of the policy is overly restrictive and does not comply with paragraph 16b of the NPPF, which requires that plans should be prepared positively, in a way that is aspirational but deliverable. It is respectfully submitted that, as drafted, the Plan does not go far enough in enabling villages in North Norfolk to grow and thrive. The criteria in this policy relating to new homes outside development boundaries will exclude all but a very limited number of sites from coming forward, because it only relates to previously developed land. The policy should be amended to remove the reference to previously developed land, to allow suitable, small scale greenfield sites which would round off or infill development boundaries to come forward.
SD3	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: • New homes should only be built where appropriate infrastructure has been developed e.g. roads, electric vehicles, integrated public and community transport, health services (inc GPs), schools, digital access etc., and should be 'communities'
SD3 Page 53	Hall, Mr Stephen (1215856)	LP220	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Southrepps being designated 'Small Growth Village'. Firstly the HELAA and Background Paper 2 describes the village as having no infrastructure constraints, this is factually untrue. The Highway Infrastructure makes the Village unsuitable for Growth other than small sites of 5 or less. The main street narrows to a point where two vehicles struggle to pass, particularly large vehicles which are increasing every year. Residential Properties have front doors leading onto the main street. There is one footpath (PF18) linking Upper and Lower parts of village other than single track roads which are unsuitable for walking due to the speed and amount of local traffic. The primary school is not within the boundary of Southrepps so the HELAA should not state Southrepps as having a School. The majority of sites identified within the HELAA do not have access onto roads suitable to take development. This is a rural village and for the HELAA to show 16 sites with the possibility of 394 dwellings shows a complete lack of understanding of the uniqueness of the Village, which lies within the AONB and has several SSI's. Development, however small will affect the quality of life, not only of it's residents, but that of local wildlife and nature and will create further light and noise pollution of a sensitive area. Long Lane, Sandy Lane, Clipped Hedge Lane, Church street (in places) are all single track roads. The amount of through traffic is increasing every year as the District grows. The Village has very poor sustainable transport links and any growth will only lead to a further increase in traffic affecting air quality and peoples right to a quality of life. The allocation of a Small Growth Village and future development would not meet the requirements under the policy SD14 (numbers 1,2 & 4). Southrepps to be designated as Countryside.
SD3	Hall, Mr Stephen (1215856)	LP222	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: how you can allocate for housing between 0-50 units in 'Small Growth Villages' and retain the character of the District. Southrepps for instance has 16 sites identified within the Village that could accommodate 394 dwellings (HELAA). The Highway infrastructure within a lot of these villages, including Southrepps, are not designed for growth. Development should be concentrated on major towns and allowing sites of 0-5 houses within Villages. Local Plan to recognise the affect that growth in Villages as proposed will not protect the character
SD3	Hall, Mr Stephen (1215856)	LP224	Object	See rep LP220

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SD3	Hall, Mr Stephen (1215856)	LP216	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The proposal to allow 'growth villages' to accept developments of 0-20 will be misused by small developers. 10 applications for 10 houses will have the same affect as 1 application for 100 houses yet they will not contribute towards local infrastructure or to the wider community.
SD3	Hay-Smith, Mr Clive Alflatt, Mr James (Agent) (1217382 1217379)	LP536	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Secondary Settlement have a role of accommodating around 20% of all new residential development. Sheringham benefits from a range of services and amenities, including a Primary and High School, Leisure Centre, Medical Practice, alongside a range of shops, services and employment opportunities. Sheringham also benefits from a train station, which provides relatively frequent and direct connections to Norwich, West Runton, Cromer, North Walsham, Hoveton, Wroxham and Salhouse. Accordingly, Sheringham is a suitable location for additional growth.
SD3	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In addition to infrastructure costs, the transport implications of planning decisions must be estimated, and everything done to minimise them. The pattern of out of town, car dependent housing schemes has to stop.
SD3	Rice, Mr Colin (1210475)	LP128 LP129	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Treating settlements that are not designated 'growth settlements' as countryside is a conceit as so many beautiful hamlets and villages are clearly not simply countryside and whilst part of the countryside are distinct from it. If this policy is pursued relentlessly they would whither away and die. Whilst development to meet identified needs should be encouraged in existing larger towns and villages, policy should also allow - rather than promote or encourage - limited development in the settlements that are not designated for growth. This approach is in line with NPPF paragraph 68(c). It does not say that small settlements should be allowed to whither and die: paragraph 78 'Rural Housing' requires that 'planning policies should identify opportunities for villages to grow and thrive'. Paragraph 2.1 of the June 2018 Interim statement of housing land supply notes that 75% of the dwellings built in the previous period occurred in larger settlements, i.e. as a matter of course meeting the proposed new policy of housing being restricted to 'growth settlements', and therefore undermines the proposed black and white policy of so absolutely restricting development in the 'countryside' settlements. Ideally there should be an intermediate designation of 'settlements in the countryside' within which new development is permitted. Proposed rewording (replacing the test 'and' with 'or' and adding another category based on NPPF): Within settlements in the area designated as Countryside residential development will be permitted only where it accords with other policies in this Plan, or: 1. the proposal is for small scale development of typically no more than five dwellings; or, 2. the site comprises of previously developed land; or, 3. the development would remediate despoiled, degraded, derelict, contaminated or unstable land [as stated in NPPF para 118(d)] 4. development of the site would result in infilling or rounding off of a predominantly built up area. Alternatively, reintroduce settlement boundaries around the non-growth settlements that are currently misleadingly designated as 'countryside'.
SD3	Ringer, Mr Callum (1218564)	LP772	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: How are growth villages chosen? I would not be against, for example, further small developments in Bodham.
SD3	Table 1 Total Projected Housing Growth 2016 - 2036 (Duncan, Mr Phillip 1217309)	LP436	Object	see attached doc

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SD3	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 3.1. The landowner and delivery partners support the plan vision of focusing a significant proportion of the required plan development towards North Walsham, Fakenham and Cromer. These are the largest and most sustainable settlements able to accommodate growth. The vision recognises the need to deliver a mix of resource efficient and secure residential development to meet local needs including affordable housing, homes for the elderly which is an appropriate strategy. Meeting all housing needs is consistent with the NPPF.
SD3	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan is justified, because it is an appropriate strategy, with land beyond the existing settlement boundary on the edge of the most sustainable and accessible settlements being released for development. Failure to release sufficient land would likely result in a plan that is not positively prepared. The plan is overall consistent with national policy and will result in sustainable development.
SD3	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The settlement hierarchy for North Norfolk, and in particular, the identification of Cromer as a Large Growth Town where the majority of new commercial, residential and other types of development will take place is supported. This is based on sound evidence that Cromer has the services and infrastructure to accommodate new development sustainably. The policy states that the distribution of development will have regard to the complementary roles played by Cromer, Holt and Sheringham in the central part of North Norfolk however, further clarity is required on this statement.
SD3	Carr, Mrs Elizabeth (1216730)	LP409	Support	building in small growth villages as identified in Policy SD3 has the danger of allowing 'urban sprawl' which results in East and West Runton becoming an extension of Sheringham and Cromer (which already have areas identified for development). When travelling the coast road from Cromer to Mundesley you are in Overstrand before you realise you have left Cromer and there is a danger that in Trunch in particular, but also in Southrepps, any development will eventually lead to the loss of identity of these individual villages. As a tourist, it is the green gaps between settlements that provide the interest. Higher prominence for keeping villages as named in Policy SD3 as countryside villages, especially those on the coast and those within (or on the edge of the AONB) and by not allowing the current defined boundaries to be altered
SD3	Bluss, Mr Andrew (1210045)	LP027	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: "green and pleasant land" is under constant threat from being covered by bricks, concrete and tarmac. Little or no consideration given to that once our unspoilt, beautiful countryside is gone forever and the impact a development on this scale would have on the wildlife. Dark sky would be diminished by the increase in light pollution.
SD3	Goodman, Mr Jonathan (1216747)	LP229	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Policy suggests that there is no housing requirements in the countryside for anyone other those meeting the affordable housing definition. There needs to be more requirement in the policy to allow for natural growth within villages to protect families who have been in villages for generations and wish to stay living in the same village but do not necessarily require to work away from home and/ or do not necessarily work in farming. With the 'millennial' work ethic, the council should embrace this position, most office based rolls can now be undertaken from almost anywhere in the world. I wish the council to make proper consideration for people who have either grown up in a village and who's family or parents are still living in the village and who do not rely on affordable or social housing, to be able to apply for planning to build a house close to family, a 3 mile radius, in order to provide support for relatives and continue to

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				<p>enjoy family life. There are to many families who are split up because they do not meet the councils criteria, however family groups are important to the longevity and protection of villages Families in small villages who have been integrated to the community for many generations are generally responsible for many of the local services, working in the pub, the village shop, running fetes, the village hall, the church etc. They should be treated as minority groups who require support and special consideration from planning, the same as gypsies and people on low incomes. Outside defined development boundaries in areas designated as Countryside residential development will be permitted only where it accords with other policies in this Plan, or: - the proposal is for small scale development of typically no more than five dwellings; and, - the site comprises of previously developed land; and, - development of the site would result in infilling or rounding off in a predominantly built up area. -** and/ or the site provides a residential development to support local families stay within close proximity to each other, 3 mile radius.**</p>
SD3	Green, Mr Stephen (1218541)	LP770	General Comments	<p>All the houses must be built in areas which have shops, schools, and employment within walking distance or with adequate public transport provision. We must not build any more schemes where it is necessary to have a car in order to get anywhere.</p>
SD3	Gurney, Mr Simon. Lambert, Mr Jake Bidwells (Agent). (1217173 1217147)	LP357	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We strongly recommend that Land off Bull’s Row is allocated for residential development, comprising up to 25 dwellings. The site is entirely deliverable, and capable of making a significant contribution towards satisfying the Councils’ housing needs during the period to 2036. Land Off Bull’s Row was submitted as part of the 2016 Call for Sites consultation window and assigned the site reference H0180. Subsequently, the site received a preliminary suitability assessment within the June 2017 Housing and Economic Land Availability Assessment (HELAA). However, Policy SD 3 of the First Draft Local Plan consultation does not recognise Northrepps as a Small Growth Village. It is understood that the Council is seeking views on the appropriateness of its selected Small Growth Villages, before undertaking a process of identifying potential development sites. This representation is therefore split into two parts, designed to address the following: 1. Advocate the elevation of Northrepps from ‘Countryside’ to a ‘Small Growth Village’; and 2. Alert the Council to the deliverability of site H0180, which should be allocated for small scale residential growth as part of Northrepps’ ‘Small Growth Village’ designation. By facilitating the two points above, the Council will secure the delivery of a suitable small-scale growth site, capable of providing growth in the Plan period. 1. Northrepps The Council’s Background Paper 2: Distribution of Growth, released as part of the First Draft Local Plan consultation, outlines the methodology used to justify the selection of the Small Growth Villages. Page 11 of the Paper acknowledges that settlements have been assessed at a high level, and further consideration will be given through the Local Plan process to other villages in North Norfolk, which may be more suitable for small-scale growth. While our client is supportive of the emerging Plan’s intention to allocate sites across Small Growth Villages, in accordance with the NPPF, it is apparent that the methodology is flawed, and should be reconsidered to ensure that growth requirements to 2036 can be delivered. The starting point of this assessment was to assess only those settlements which had a school or a shop. From this initial sift, Northrepps was progressed through for further analysis. Northrepps Primary School is located within circa 325m (0.2 miles) from Land off Bulls Row. The school accommodates children between the ages of 2-11, and has a capacity of 52 pupils, with a current roll of 36 pupils. The school would therefore benefit from the support further small-scale growth in Northrepps to 2036 would bring. The next stage of the assessment sifted out those settlements which had a school or shop, but less than four of the ‘secondary’ or ‘desirable’ services. Northrepps contains two secondary services (public house and village hall) and one desirable service (place of worship). As Northrepps contains just three of the ‘secondary’ or ‘desirable’ services, it was discounted from further analysis. While this is an accurate reflection of the services available within Northrepps, this methodology is flawed. This is because some Small Growth Villages have been selected based on service provision alone, before site-specific planning constraints have been considered. Furthermore, housing density in</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>these locations is likely to be low, to reflect the character of the settlements, which adds further pressure on the spatial distribution of growth amongst the Small Growth Villages. The First Draft Local Plan seeks to allocate 400 dwellings across each of the Small Growth Villages. The draft settlement hierarchy outlined under Policy SD 3 includes 23 Small Growth Villages. To achieve the distribution of 400 dwellings across these Small Growth Villages, 18 dwellings must be allocated in each Small Growth Village. We are therefore concerned that many of the Small Growth Villages will not be able to accommodate 18 dwellings in the Plan period to 2036. The settlement hierarchy should therefore be reconsidered to ensure that 400 dwellings can be achieved across the Small Growth Villages. As outlined above, Northrepps contains a good range of services, including a primary school (with capacity), a village hall and a place of worship. These services can serve further growth, and require proportionate growth to maintain their vitality. By restricting the growth of settlements like Northrepps, the Council's methodology is considered to be contrary to paragraph 77 of the NPPF which states that: "To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services." In addition, Northrepps has a legacy of residential growth, with 40 dwellings recently completed following the approval of planning permission reference PF/14/1559. The settlement is therefore capable of absorbing further growth. Site H01080 represents an optimum location to deliver further residential growth of between 0-20 dwellings on a site less than 1 hectare in size (site area = 0.788ha), to reinforce Northrepps position as a Small Growth Village. The deliverability of this site is discussed in detail below.</p> <p>2. Land Off Bull's Row, Northrepps (H0180) As discussed, Land Off Bull's Row received a preliminary suitability assessment within the June 2017 Housing and Economic Land Availability Assessment (HELAA), with most criteria achieving Green ratings. These are summarised below: Assessment of Deliverability Suitable</p> <ul style="list-style-type: none"> • Access to Site: Green rated. Suitable access can be provided from Broadgate Lane. • Coastal Change: Green rated. • Contamination and Ground Stability: Green rated. • Flood Risk: Green rated. • Market Attractiveness: Green rated. The site is in a desirable location. • Utilities Capacity: Green rated • Utilities Infrastructure: Green rated. • Biodiversity and Geodiversity: Green rated. • Compatibility with Neighbouring / Adjoining Use: Green rated. • Historic Environment: Green rated. • Open Space: Green rated. • Townscape: Green rated. • Transport and Roads: Green rated. <p>Some suitability criteria within the HELAA assessment of the site received Amber ratings. These issues are explored in more detail below: Accessibility to Local Services and Facilities: Amber rated. The HELAA comments that the site is within 2,000m of a school in Overstrand, but further than 1,200m from a shop. Northrepps Primary School is located within circa 325m (0.2 miles) from Land off Bull's Row. There is a village shop at Forest Park in Overstrand, which is circa 1.3 miles from the site. Considering the close proximity of Northrepps Primary School, and its capacity to accommodate new students, and the proximity of a shop in the local area, the site should receive a Green rating for this element. Nationally and Locally Significant Landscapes: Amber rated. The site falls within AONB. This is reflective of most of the Small Growth Villages, so should not count against the ability of Northrepps, and Land Off Bull's Row, to accommodate further small-scale growth. Indeed, the recent 40 dwelling development in Northrepps (reference PF/14/1559) was also entirely located within AONB. Land Off Bull's Row offers an opportunity to 'round off' the village to the north, converting an underused area of grassland into an optimum small growth site. Considering the less sensitive location of the site within the context of the AONB, and its relationship with the existing built form, the site should receive a Green rating for this element. From this analysis, it can be ascertained that Land Off Bull's Row represents a suitable site for a small-scale residential development. The site can deliver 0-20 dwellings on a site less than 1 hectare, demonstrating compliance with North Norfolk's criteria for development sites in Small Growth Villages. Available The site, in its entirety, is owned by our client, and there are no leases or restrictive covenants on the site consequently, the site is readily available for development. Achievable The NPPF recognises that small and medium-sized sites can make an important contribution to meeting the housing requirement of an</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>area, and are often built-out relatively quickly (Paragraph 68). The NPPF therefore requires Councils to accommodate at least 10% of their housing requirement on sites no larger than a hectare. North Norfolk Council are endeavouring to adhere to this requirement, through the allocation of small sites in the Small Growth Villages. Land Off Bull's Row represents a clear opportunity to secure a site which can contribute towards this policy requirement, through the delivery of small-scale housing within the Plan period. Viable Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision. No abnormal issues have been identified which might make development unviable. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary. Summary To conclude, it is apparent that Northrepps should be considered as a Small Growth Village. The village contains a good range of services, and has the capacity to absorb further growth. Land Off Bull's Row offers the opportunity to deliver that further growth within the Plan period. The site represents a logical extension to the Northrepps through the conversion of underutilised grassland. This representation has demonstrated that the site is suitable and available for housing development, with no barriers to commencement. The site is therefore deliverable in terms of the NPPF Glossary definition. The promotion of Northrepps to a 'Small Growth Village'. Alternative site at Land off Bulls Row submitted.</p>
SD3	Waddingham, R.N. and Family Agent- Hill Iain (Bidwells) (1217471 1217471)	LP596 LP608	Support	<p>Briston is identified as a Large Growth Village, where new development will be focused. Briston benefits from a range of existing shops and services, including a Post Office, Co-op, Primary School and a Nursery. Further to this, Briston also benefits from multiple bus stops (with the closest bordering the site). These stops provide a variety of frequent services to Holt, Fakenham, and Norwich City Centre. Accordingly, Briston is a suitable location for additional growth.</p>
SD3	Symonds, Ms Ann (1209801)	LP012	General Comments	<p>This query is regarding the site assessment methodology. The land in question is HELAA reference (2017) H0016, (BEE05). According to the attached relevant sections of the suitability assessment report H0016 is considered more constrained (orange on map) for development and has been excluded, not only from development opportunities but also the potential site list. There were submissions for three additional plots surrounding this land: one that borders the land to the north-west; a second that borders the land to the south; and a third west of the land on opposite side of the road. These were all considered less constrained (blue on map) and identified as potential sites for development. There appear to be several distinct inconsistencies in the assessment. Two of the others are in an Area of Outstanding Natural Beauty –a highly sensitive landscape area but the plots are considered to only have the same constraints as a site that is adjacent to, not in, an AONB. All four sites were given amber lights. The market attractiveness of site H0016 under the first section deems the road network unsuitable and again under the second (impact) section the transport and local road network is considered to be unsuitable. Both assessment items were given a red light. However the plots directly opposite it and next to it, both accessed from the same road, were given green lights for both market attractiveness, considered to have suitable access with no major constraints; and under the transport and roads item are foreseen as having no detrimental impact on the functioning of the local road network. The same green rating was given to the plot that appears to require access through H0016 which has a red rating and is said to be unsuitable in terms of access. These are conflicting ratings and suggest they have not been assessed equally considering the conditions on the ground are the same. In summary why has H0016 got red ratings for transport and access where the other plots either reliant upon it for access or are accessed from the very same road within meters of one another received green ratings? Surely all plots should have the same rating if they are accessed off the same road? Why has H0016 got an amber rating for being next to an AONB when those in it also have the same rating? The result of the assessment in Beeston Regis is that the three other sites have been identified as potential sites, despite the inconsistencies in the assessment process. Though</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				overall no development is planned in Beeston Regis under the current draft local plan, it is important that the assessment is fair and considers all land equally and it appears that this has not been the case. It is believed that the methodology has not been applied consistently throughout the assessment of the four neighbouring plots. This could place site H0016 at a disadvantage in future calls, besides calling into question the validity of the assessment process. If there are inconsistencies in the assessments the process and its finding are not legitimate. I understand that the assessment will not finally determine the inclusion of the area in the plan but a negative assessment will result in the particular site being taken out of the 'pool' from the outset.

Individuals	Number Received	Summary of Responses (Policy SD3)
Page 59	Summary of Objections	40 The majority of respondents objected to growth in the Small Growth Villages and the Countryside. Housing development should be focussed where there is appropriate infrastructure, public transport, healthcare and other services including employment and the approach fails to integrate problems of climate crisis. many suggested that rather than allocating in these villages, development should be allowed on infill and brownfield sites. Concerns that the countryside is under constant threat of being developed; having an adverse effect on wildlife and dark skies etc. Others though objected that due to concerns that the Plan doesn't go far enough and should be promoting limited development in settlements not currently designated for growth, in order to enhance and maintain the vitality of rural communities. Suggest that Bodham, Edgefield and Northrepps are identified as suitable Small Growth Villages. Suggest amending the policy to remove reference to PDL and allow small scale development on greenfield land or vacant derelict sites. Also suggested removing the wording 'Outside defined development boundaries...' altogether. More consideration should be given to provide housing for local people with families within a 3 mile radius. One objection promotes the alternative option to provide new settlements and new roads instead. Raise concerns around Large Growth Town designations, specifically; Cromer, Fakenham, North Walsham. Small growth town designations, specifically; Hoveton, and Wells-next-the-sea. Large Growth Villages ;Briston & Melton Constable, Mundesley. And Small Growth Villages; Bacton, Happisburgh, Langham , Little Snoring, Southrepps, Trunch, Walcott. See specific settlement summary below. Suggest change to bullet point 7.20 'reduce' with 'minimise'.
	Summary of Supports	10 Support the principle of development being targeted in designated settlements and recognises the benefits of allocating land immediately adjacent to built up areas. Growth most required where there are employment and services. Development in rural locations would generate additional car journeys. Suggested amendments to remove reference to PDL and allow small scale development on greenfield land or vacant derelict sites. Development should only commence when capacity at Schools, Doctors, Dentists is ensured. Support the identification of Briston as a large growth village.
	Summary of General Comments	15 Most comments recognised that this is an appropriate strategy and is overall consistent with national policy resulting in sustainable development. General understanding of the need for housing and the policy is reasonably well argued. Housing should be located near to shops, schools, employment and public transport. One comment states that accepting development of 0 - 10 dwellings will have same impact as 100 houses but will not contribute towards local infrastructure or to the wider community. Suggest amendments to allow small scale new build on greenfield sites subject to occupancy restrictions. others raised concerns around Small Growth Town designations, specifically; Holt and Wells-next-the-sea and Small Growth Village Weybourne. See settlement summaries below. The exclusion of a site / Beeston was challenged on the basis of the 2017 HELAA assessment and its non inclusion as a selected settlement.
	Overall Summary	A number of comments received to this policy. Key issued raised focused on: In order to meet environmental objectives, development should be focused where appropriate infrastructure, services, public transport and employment are in place and there is a specific housing need and the overall support for focussing development in Large Growth Towns, which are the largest most sustainable and able to accommodate growth. One representation disagrees and considers that the town infrastructures will be unable to cope and a more appropriate option would be to build a new settlement. There was some support for growth in villages, to address housing need and maintain vitality of rural communities. One representation questions whether small growth villages can accommodate the proposed growth without site-specific constraints being considered. In the main, it is considered that villages are unsuitable

Individuals	Number Received	Summary of Responses (Policy SD3)
		locations for growth. There is no local demand and limited employment or services. There is strong support for provision of affordable housing in villages, and for the protection of village character and green gaps between settlements. Many consider that allocating development in Small Growth Villages will have a knock on effect on the delivery of rural exception affordable housing schemes and a preference was expressed for small scale and suitable infill development coming forward. On the other side, some consider that growth in Countryside is overly restrictive and small scale development should be allowed on greenfield sites and on derelict neglected sites.
Large Growth Towns		Overall support for focussing development in Large Growth Towns, which are the largest most sustainable and able to accommodate growth. One representation disagrees and considers that the town infrastructure will be unable to cope and a more appropriate option would be to build a new settlement and roads.
Cromer		Concerns relate to Cromer's status a Large Growth Town, mainly due to the landscape constraints encompassing the town.
Fakenham		Concern expressed about the impact of major residential growth in respect of the lack of employment opportunities and services available.
North Walsham		One representation raises concern over the ability of North Walsham to accommodate growth due to the current volumes of traffic and the car parks being full. Concerns expressed about the capacity of doctors and dentist.
Hoveton		Concern about Hoveton's proposed Small Growth Town status (when it is a village) adding to the current heavy volumes of traffic experienced in the village and the resulting congestion, air quality issues. Concerns also expressed about the adequacy of education, health provision. Concerns over surface water, flooding and foul water drainage.
Sheringham		One comment considered Sheringham as suitable to accommodate growth as it has a wide range of services and amenities.
Wells		Agrees with Well's status of a Small Growth Town but should be recognised that the town has a finite capacity.
Briston		Concern raised about Briston's Large Growth Village Status, increasing traffic, especially by school and the impact on the character of Briston – development could lead to identical overdeveloped villages in a location where tourism is important. Concerns expressed about the capacity at doctors.
Small Growth Villages		feedback suggested that villages are unsuitable locations for growth. There is no local demand and limited employment or services. There is strong support for provision of affordable housing in villages, and for the protection of village character and green gaps between settlements. Many consider that allocating development in Small Growth Villages will have a knock on impact on the delivery of rural exception affordable housing schemes. Happy with small suitable infill development. On the other side, some consider that growth in Countryside is overly restrictive and small scale development should be allowed on greenfield sites and on derelict neglected sites and other settlements should also be promoted
Bacton		Objection to Bacton status as a Small Growth Village due to impact development could have on the character of the village which historically has a 'scattered or 'dispersed' settlement pattern. Express concerns about the adequacy of infrastructure, public transport and traffic and associated pollution. Difficulty getting to doctors, schools and shops. Parking and a bypass of the old part of the village is needed before development is built. Issue with the number of second homes and impact on housing affordability.
Happisburgh		Concerns expressed about the adequacy of infrastructure, public transport and traffic. Along with issues of the number of second homes and housing affordability.
Mundesley		Concerns expressed about the adequacy of infrastructure and services which are at capacity. Issues with traffic and housing should be affordable.
Northrepps		Propose Northrepps as Small Growth Village.
Little Snoring		Lack of services and facilities, public transport, issues with road network, broadband nearing capacity, Limited capacity at WasteWater treatment works. Important to preserve rural character and green space. Would impact wildlife.
Langham		No shop or post office.
Southrepps		Will lose identities, strain on road network, impact on wildlife, lack of public transport. Located in AONB. Would impact on quality of life for residents. Create light and noise pollution. Development in Mundesley will impact Southrepps. Respondents were against the identification of Southrepps as an infill village
Trunch		Low water pressure in village. Important Conservation Town. Limited facilities

Individuals	Number Received	Summary of Responses (Policy SD3)
Walcott		Concerns expressed about the adequacy of infrastructure, public transport and traffic. Along with issues of the number of second homes and housing affordability.
Weybourne		No public transport for working people, lack of services, new homes unaffordable to local people. Negative impact on AONB and wildlife. Parking inadequate
Alternatives		Bodham, Northrepps, Edgefield promoted as Small Growth Villages. Fails to recognise the settlements that are within close proximity to higher order settlements. Weybourne, Southrepps, Bacton, Walcott, Happisburgh should not be identified settlements. Alternatively put forward include, reintroduce settlement boundaries around the non-growth settlements that are currently misleading designated as 'countryside'.
Council's Response		Noted: Consider comments in the finalisation of the policy. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback evidence of need and the potential impacts on affordable housing provision.

Policy SD4 - Development in the Countryside

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD4	Witham, Mr I M (1216498)	LP202	Support	A general presumption away from development in the Countryside (with exceptions as generally recognised) is very much the right approach to sustainable development in north Norfolk
SD4	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agriculture and food production is another heavy producer of carbon emissions. Has not only accelerated climate change, but also destroyed ecosystems that we rely on. NNDC does not have control of agriculture, but it should work with farmers and environmentalists to support organic farmers wherever it can. Planning permission for factory farms should stop.
SD4	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. The preservation of rural economy is essential. Development appropriate for this is necessary and should positively favour those working in the rural economy.
SD4	Johnson, Mr Jamie (1216384)	LP347	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Make a case that in addition to small scale greenfield infill site development being permitted outside of development boundaries for permanent residence restrictions, so to would the following categories be permitted: . 1. Exemplary highly energy/water/renewables efficient low carbon small scale sustainable build projects which can act as pioneering examples encouraging ‘high quality sustainable and climate change resilient design with makes the best use of improvements in technology’ (as stated in draft plan Aims and Objective paragraph 6.4). Also supported by NPPF para. 131 on ‘Achieving Well Designed Spaces’ stating ‘Great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings’ . 2. Highly sustainable commercially available ‘eco tourism’ holiday lets (which comply with the plan’s paragraph 10.50 on available commercial holiday letting). (evidenced in NPPF para. 83 ‘Supporting a prosperous rural economy’ ‘Planning policies and decisions should enable: sustainable rural tourism and leisure developments which respect the character of the countryside’) 3. Exemplary low carbon Self and Custom builds. . All of the 3 above categories would act as exemplars of water, energy, renewables and emissions efficiency, include ultra low emissions and plug-in vehicle facilities, biodiversity-enhancing landscaping and build technologies and support and present a vision towards the Government's outlined 'transition to a low carbon future'. The following categories should be allowed in the countryside: 1. Exemplary low carbon small scale sustainable projects in line with para 131 2. Highly sustainable commercially available ‘eco-tourism’ holiday lets 3. Low carbon Self and Custom Builds All of which would act as exemplars of water, energy, renewables and emissions efficiency, include ultra low emissions and plug-in vehicle facilities, biodiversity-enhancing landscaping and build technologies and support and present a vision towards the Government's outlined 'transition to a low carbon future’.
SD4	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Allow more small scale development in rural villages to meet local demand by committing to do so on a case by case basis rather than linkage to specified available facilities.

Individuals	Number Received	Summary of Responses (Policy SD4)
Summary of Objections	2	This policy received two objections. Suggest changes to policy to allow for low carbon development in the countryside including small scale greenfield infill sites for permanent residence, low carbon small scale sustainable projects, 'eco-tourism' holiday lets, Low carbon Self and Custom Builds. Suggest that NNDC works with farmers to support organic farming where possible and should not allow permission for factory farms.
Summary of Supports	2	Two support this policy. Consider that the general presumption against development in the Countryside is the right approach to sustainable development in North Norfolk. But appropriate development should be allowed to ensure that the rural economy is preserved.
Summary of General Comments	1	One comment received. Allow more small scale development in rural villages to meet local demand by committing to do so on a case by case basis rather than linkage to specified available facilities.
Overall Summary		No substantial issues raised, consider that the general presumption against development in the Countryside is the right approach to sustainable development in North Norfolk. However others suggested that more small scale development is allowed in rural villages to meet local demand. Suggest that the policy should allow for low carbon development in the countryside including small scale greenfield infill sites for permanent residence, low carbon small scale sustainable projects, 'eco-tourism' holiday lets, Low carbon Self and Custom Builds.
Council's Response		Comments noted: The Local Plan supports the transition to a low carbon future and included policies throughout the plan to allow appropriate development in countryside locations in line with the approaches envisaged in national policy. Paragraph 79 in the NPPF also allows for exceptional development proposals in the countryside subject to truly outstanding and innovative design which also enhances the setting .

Policy SD5 - Developer Contributions & Viability

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD5	Carr, Mrs Elizabeth (1216730)	LP400	General Comments	Introduce a Community Infrastructure Levy on all new developments whatever the size, related to and proportionate to the number of properties to be built on site in order to provide a pot of money to build new roads and underground utilities before any building takes place. If it is identified that the health and welfare of current local residents will be detrimentally affected by any new development, insist that provision is made in the levy for an increase in funding to the NHS In North Walsham a new link road between the B1150 and the A149 Cromer Road would need to be established and an increased provision of health services, school, dentists, broadband, water supply and waste removal before any further development was considered.
SD5	Walker, Mrs Kerry (1217345)	LP351, LP346	General Comments	Highlights the pressure on Hoveton's infrastructure, namely: ~Road Infrastructure ~Water and Sewerage ~Education ~Health. Suggested that NNDC acknowledge the limits to growth for Hoveton based on the challenges of road infrastructure and the life span of Wroxham Bridge. That prior to any development in Hoveton conditions are placed upon all developments (major or minor) in respect to connecting foul water to the sewer network until such a time that Anglian Water have implemented their catchment strategy for Hoveton.
SD5	Woodward, Mrs Josephine (1217427)	LP604	General Comments	Developers must adhere to their promises with regard to contributions to infrastructure. Necessity of enforcing developer contributions to infrastructure.
SD5	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP255	Object	The Policy notes that: 'the Council will, subject to viability, secure site specific developer contributions in order to properly service, manage and mitigate the impact of development, which are directly related to development, and are necessary to make the development acceptable and cannot be secured by planning conditions.' Paragraph 4.4.17 of Background Paper 4, the Infrastructure Position Statement, lists the junction in Roughton of the A140 and B1436 as a congestion 'hot-spot'. We note that, on the North Norfolk policies map, land to the north of our client's site Land East of Norwich Road has been safeguarded for future junction improvements. Development of this site would take account of any planned improvements to the junction, and would make a proportional contribution to any improvements accordingly.
SD5	Smith, Mr Anthony (1218514)	LP767	General Comments	On SD5, point 1a, I would amend to read: "...developer contributions... that are necessary to make the development acceptable to the community." This would put the onus on developers to listen and pay genuine attention to the meeting the concerns expressed by a community targeted for development. In two consultations in my community in the past ten years, developers paid no attention to the views of the community, clearly articulated over many months. In the minds of some residents, such one-sidedness undermines confidence in the integrity of the process for determining planning applications.
SD5	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. The contribution made by developers and the evidence required to support development should include environmental impact, traffic generation, disruption to residents and traffic during development, and sustainability. It should also seek to prevent developers seeking planning permission purely to increase the value of their land / assets with no intention of going to construction stage; thus leaving land allocated but in effect unable to contribute to the overall target for housing. In particular a "meaningful" start must be made on site within 6 years or planning permission should be rescinded. Meaningful should be foundations and services and in particular the fulfilment of any section 106 agreements in full as a minimum.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD5	West, Dr Louisa (1210536)	LP057	Object	The Plan fails to address the impact of increased visitors to the area as access is improved by the NDR. The road infrastructure in North Norfolk must be improved in line with the ever increasing traffic, including as more comes via the NDR and its planned extension. Consideration must be given to parking space needed by motor homes and caravans waiting to go onto sites. Local residents have more problems crossing roads, due to increased traffic. NNDC must get the Highways Agency and NCC to recognise that the District's roads are substandard.
SD5	Drury, Mrs Margaret (1210793)	LP086	General Comments	Re transport I would like to see developer money being committed to provide round town transport, e.g. by North Norfolk Community Transport. Without this our roads will be gridlocked.
SD5	Boyles, Mr Craig (1217440)	LP503	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Growth, housing, would likely impact on future Primary Care, Community Care and Mental Health service provision, as well as the provision of sub-acute services in community settings. Existing Primary and community care estate does not have capacity to accommodate significant growth. The N & W STP have identified the anticipated impact on infrastructure arising from these proposals. Existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth shown in this LDP document. Developments contained within would have an impact on healthcare provision in the area and its implications, if unmitigated, would be unsustainable. In instances where major policies involve the provision of development in locations where healthcare service capacity is insufficient to meet the augmented needs appropriate mitigation will be sought. The exact nature and scale of the contribution and the subsequent expenditure by health care providers will be calculated at an appropriate time as and if schemes come forward over the plan period to realise the objectives of the LDP. Policies should be explicit in that contributions towards healthcare provision will be obtained and the LPA will consider a development's sustainability with regard to effective healthcare provision. Before further progression and amendment of policies are undertaken, the LPA should have reference to the most up-to-date strategy documents from NHS England and the STP which currently constitute The NHS Long Term Plan and the STP Estates Strategy. The N & W STP has also identified shortfalls in capacity at existing premises covered by the LDP. Provision needs to be made within the emerging LDP to address the impacts of development on health infrastructure and to ensure timely cost-effective delivery of necessary infrastructure improvements, in the interests of pursuing sustainable development. the Plan. The Plan Should make reference to The NHS Long Term Plan and STP Estates Strategy. Timely cost-effective delivery of necessary infrastructure.
SD5	Hall, Mr Stephen (1215856)	LP221	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: North Norfolk is poorly served by NHS Health provision. GP's and Dentists, along with other clinicians are in short supply across the Country and difficult to get appointment. Retention and attracting those available to North Norfolk is difficult. Live in Southrepps, dentist in North Walsham. The NHS dentist left, they couldn't recruit and my Dentist is now in Sheringham. Provision of emergency care is a lottery. Often long waits are required for ambulances to the Norfolk and Norwich Hospital. You are far more likely to die in North Norfolk in an emergency than you are in Norwich. North Norfolk needs an A&E ideally or a far better response in regards to emergency health requirements. Any further growth across the District should reflect reality rather than words as outlined in the Health Protocol March 2019 document. How can you ensure additional GP's Dentists etc. when they do not physically exist. If Council's refused growth until Central Government sorted out the issue it would focus their minds. Although I recognise that NNDC are not responsible for this provision the Local Plan is there to protect local residents and enhance their Health and Wellbeing. Developer contributions to build a new Health Centre is great.....but not if you have no GP's to man it. On the policy itself I would suggest a Health Impact Assessment should be required to be provided by Developers for a lower number than 500 properties. I would suggest the region of 200 properties (500 people) would be more realistic. The policy states consultation with Healthcare planning for 50. However, your approach to settlement hierarchy is going to lead to small growth in Villages across the District.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				Ten developments of 5 or 5 developments of 100 will not be covered under the proposed policy but has exactly the same effect. Health & Wellbeing is a very important aspect of the Local Plan. Open and Green Space, cycleways, Play Areas, Quiet rural areas, Parks, indoor and outdoor affordable sports facilities etc. all play a major role in physical and mental health and take the pressure of the NHS at all levels. This should be at the forethought of the Local Plan and a vein throughout the whole document. Failure to do so will only make the District a busier but not better place. With regards to Developer Contribution the policy for S106 contributions should be altered to ensure that a 'levy' is obtained from all residential development including developments of 10 or under. It is not fair or reasonable that when your hierarchy settlement proposals are going to encourage small growth within Villages across the District that small developers do not contribute towards local infrastructure. 10 developments of 5 Houses within a Village adds no financial contribution but 1 development of 50 does. How is this right. Both examples bring the same number of houses/people and strains on local infrastructure. Introduce a levy on small developments. On the policy itself I would suggest a Health Impact Assessment should be required to be provided by Developers for a lower number than 500 properties. I would suggest the region of 200 properties (500 people) would be more realistic. With regards to Developer Contribution the policy for S106 contributions should be altered to ensure that a 'levy' is obtained from all residential development including developments of 10 or under.
SD5	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 3.5. The use of developer contributions to ensure the delivery of necessary infrastructure improvements, secure sustainable communities, and to meet the wider sustainability objectives and specifically manage and mitigate the impact of development is supported in principle. 3.6. The policy does not provide detail on how contributions will be calculated nor does it refer to any future Supplementary Planning Documents (SPDs) which could provide further detail on determining contribution levels. Further clarity is requested alongside recognition that contributions are subject to viability review. Part 3 which includes a list of contributions infers that contributions listed will be sought for all development proposals, however the policy wording should be changed to explain that contributions should be sought on a site by site basis, where deemed necessary to mitigate the impacts of a particular development. Further clarity is requested alongside recognition that contributions are subject to viability review.
SD5	North Norfolk District Council Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: These matters to be vital to the success of larger scale development throughout the District. Residents are entitled to expect that their infrastructure requirements will be fulfilled. While all of the infrastructure listed is of importance, medical provision is of growing concern to our residents. Would like to see a requirement for a complete and thorough assessment of the Health Impact of any larger scale development which is proposed. Proposals must be supported by a suitable, transparent viability appraisal. The present wording says only that they should be so supported.

Individuals	Number Received	Summary of Responses (Policy SD5)
Summary of Objections	3	Objections express concerns over the competing demands on developer contributions. Wish to see improvements in the road infrastructure and raise concerns with the provision of the NHS Health Service, GPs and Dentists are in short supply with difficulty retaining and attracting staff. Highlight the importance of providing Open Space, Cycleways, Parks, Sports Facilities to improve resident's wellbeing and to take the pressure off the NHS. Consider it unreasonable for small growth in villages to not contribute towards local infrastructure and suggest that a levy is introduced for small development. Plan fails to address impact of increased visitors.
Summary of Supports	2	Two support this policy. Suggest that evidence/ contributions required should be submitted to support development. In order to prevent developers seeking planning permission to increase land value, work on site should start within 6 years or planning permission should be rescinded.

		Housing growth likely to impact on future Primary Care, Community Care and Mental Health service provision. Existing health infrastructure will require further investment and improvement in order to meet the needs of the planned growth. Suggest that mitigation should be sought where development is proposed in locations where capacity is insufficient to meet the needs. And policies be explicit in that contributions towards healthcare provision will be obtained and the Local Planning Authority will consider a development's sustainability with regard to effective healthcare provision. Suggest that reference is made to the most up-to-date strategy documents; the NHS Long Term Plan and the STP Estates Strategy.
Summary of General Comments	7	Support in principle for the use of developer contributions, considered vital to the success of larger developments. Policy doesn't provide detail on how contributions will be calculated or refer to future SPDs which could determine contribution levels. Others suggest that CIL should be introduced. Specific concerns raised in relation to impact on Hoveton's infrastructure - road, water, sewerage, education and health. Developers must adhere to their promises with regard to contributions to infrastructure. Suggested amendment to point 1a - "...developer contributions... that are necessary to make the development acceptable to the community.". Infrastructure requirements and medical provision must be fulfilled. Like to see a requirement for a complete assessment of Health Impact of any larger scale development proposed. And must be supported by transparent viability appraisal .
Overall Summary		Support in principle for the use of developer contributions, considered vital for the success of larger development schemes. Policy doesn't provide detail on how contributions will be calculated or refer to future SPDs which could determine contribution levels. Developers must adhere to their promises with regard to contributions to infrastructure and medical provision. Improvements needed to road infrastructure, concerns over the impact on NHS Health Service, Primary Care and Mental Health Services. Suggest that policies are explicit that contributions towards healthcare will be obtained. Supported by a Health Impact Assessment of larger scale development. Mitigation should be sought where capacity is insufficient to meet the needs. Refer to up-to-date strategy documents. Suggest wording change 'Proposals must be supported by a suitable, transparent viability appraisal' . Fails to address impact of increased visitors. Specific concerns over the impact of development on Hoveton's infrastructure. Suggest that levy for small growth in villages and planning permissions should be rescinded after 6 years if site not started to prevent land banking.
Council's response		Noted, Consider comments in the finalisation of the policy. Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms. Planning obligations may only constitute a reason for granting planning permission if they meet the tests that they are necessary to make the development acceptable in planning terms. They must be: <ul style="list-style-type: none"> •necessary to make the development acceptable in planning terms; •directly related to the development; and •fairly and reasonably related in scale and kind to the development. The Council has fully engaged with key service providers to identify the likely impacts of development for local highways, water, and sewerage and energy networks. These issues have been taken into account in site assessment. The responsibility of planning and delivering healthcare lies with the Norfolk & Waveney Sustainable & Transformation Partnership. NNDC is a signatory of the Joint Norfolk Health Protocol and as such proposals for 50 dwellings or more are consulted on with healthcare planning and commissioning bodies who will determine whether any healthcare mitigation is required .

Policy SD6 - Provision & Retention of Local Facilities and Services

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD6	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. The retention of local facilities can only be sustainable if their costs and outgoings are sustainable and their customer base is retained. High taxes for businesses and the discouragement of their customers through high parking charges or lack of accessibility will erode sustainability of businesses and facilities.
SD6	Mr Phillip Duncan (1217309)	LP382 LP435	Object	Proposed Policy SD6 This refers to “designated Health and Social Care Campuses at Cromer, Fakenham, High Kelling, North Walsham and Wells-next-the-Sea.” Paragraph 11.4 of the Plan makes clear that “Land which lies within the defined boundaries of Selected Settlements will be designated as one of a number of Policy Area Designations”, one of which is “Health Care Campus” where policy SD6 would apply. Paragraph 11.3 confirms that Settlement Boundaries are shown on the maps at the beginning of settlement sections. However, there are no such campuses shown on the Proposals maps. Without such being identified, the proposed settlement boundaries cannot be considered reliable. Clarification needed.
SD6	Ringer, Mr Callum (1218563)	LP772	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Could the council talk about change of use for buildings in more detail, for example, make it much harder for village pubs and shops to get change of use as this is detrimental to the social and cultural fabric of our area. Often these businesses are bought with the sole intention of running them into the ground. requests that NNDC adopt a policy which safeguards these asset, and encourages new ones to be created under community ownership.

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Individuals	Number Received	Summary of Responses (Policy SD6)
Summary of Objections	2	This policy received two objections. Suggest amendment to policy to make it tougher for pubs and shops to change use. Health Care Campus are not shown on the Proposals map.
Summary of Supports	1	One supports this policy for the protection of community facilities but considers that the retention of these facilities can only be sustainable if their costs are sustainable and customer base is retained.
Summary of General Comments	0	None received.
Overall Summary		No substantial issues raised. Overall support for protecting community facilities, suggest amending the policy to reference change of use and make it tougher to change pubs and shops. Health Care Campus are not shown on the Policies Map.
Council's Response		Noted Consider comments in the finalisation of the policy. Local facilities considered important are detailed in footnote 16. The change of Use between Use classes is governed by the Use Classes order. Ensure the identification of Health care campuses on the policies mapping

Policy SD7 - Renewable Energy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD7	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk already makes a large contribution to renewable energy through the offshore wind farms along the coast- more than inland counties. The building of land based turbines and their inherent impact on the appearance and character of the countryside should be discouraged whilst there remains the ability to construct turbines offshore. Solar farms are also unsightly and completely uncharacteristic of the county. Steps should be taken to limit their development, particularly as land is required for agriculture. Reduction in the amount of land available for agriculture puts more pressure on the land that is remaining and encourages intensive farming to maintain yields. This results in poor environment and bio diversity and loss of habitat for wildlife. Solar farms should have surrounding hedges and appropriate wildlife (insect) friendly planting. They should not just be grassed over. Rain water run-off from the panels should be used for agriculture. onshore wind turbines should be discouraged Should limit Solar Farms Solar Farms should have surrounding hedges and appropriate wildlife (insect) friendly planting.
SD7	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk is extremely suitable for onshore wind power, as shown by our history of windmills. Wind power is an obvious way to cut carbon emissions and could be used to offset schemes. One of the first actions of this new council should be to stop the court actions which have used tax payers' money to delay two mid-sized turbines for years, after they had twice been given permission by government inspectors. Wind power is an obvious way to cut carbon emissions
SD7	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This policy to be unnecessarily negative. Like to see the wording read “Proposals for renewable technology ... will be encouraged...” rather than “permitted”.

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Individuals	Number Received	Summary of Responses (Policy SD7)
Summary of Objections	1	One objection received, Norfolk is suitable for onshore wind power and this is an obvious way to cut carbon emissions.
Summary of Supports	1	One supports this policy, raises concerns over the impact of wind turbines on the appearance and character of the countryside and the impact of solar farms on biodiversity. Suggest that hedges should be planted to retain wildlife.
Summary of General Comments	1	One comment, consider policy to be unnecessarily negative. Like to see the wording read “Proposals for renewable technology ... will be encouraged...” rather than “permitted”. Support for wind power as an obvious way to cut carbon emissions promoted.
Overall Summary		Mixed comments for this approach, seek to discourage onshore wind turbines and limit solar farms due to impact on the appearance and character of the countryside, agricultural land and on biodiversity. Suggest that hedges should be planted to retain wildlife around solar farms. However other comment that the policy is unnecessarily negative and there should be more support for onshore wind turbines in the district, to help cut carbon emissions. Suggested wording change “Proposals for renewable technology ... will be encouraged...” rather than “permitted”.
Council's Response		Comments noted: The policy approach is one that emphasises the importance of the landscape and recognises its sensitivity to wind turbine development of all scales. The approach has been informed by the 2019 landscape Character Assessment and Landscape Sensitivity Study.

Policy SD8 - Fibre to the Premises (FTTP)

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD8	Carr, Mrs Elizabeth (1216730)	LP393	Support	Broadband provision needs to be better than good, currently, so as to be able to cope with future increased demand. In a rural setting, reliance on the internet for business and social use is crucial to delivering sustainable development. Underground all new utilities as this preserves the character of the local area.
SD8	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree to some extent. The introduction of broadband and fibre across the county is important. Reliable broadband is essential in order to reduce traffic journeys and congestion through commuting as employees could work remotely from areas of employment. Unfortunately where broadband has been introduced the nature of the broadband is inappropriate. Download speeds for recreational activities are good but upload speeds that are required by those working remotely continue to be poor. A policy of appropriate broadband should be encouraged so that employment and commercial use is prioritised through better upload speeds and not frivolous use. Providers of broadband infrastructure need to be made to do this.
SD8	Wilhelmy, Mr Guy (1216159)	LP172	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I endorse the Council's policy of ensuring the maximum provision of fibre optic communication to bring high speed Broadband to as many properties as possible. In my opinion, fibre optic connectivity is more effective and reliable than any other system of Internet connection and offers speeds far in excess of 5G. Fibre optic does not have the worrying health risks associated with 5G and completely eliminates the need for 5G anyway. 5G has been developed from a weapon system where the principal function appears to be the ability to target individuals with bursts of high power directed microwave radiation, it's that capacity that is of concern due to the damage that such radiation can inflict within the human body. I suggest that the Council should adopt a policy of only promoting fibre optic Internet connection for properties within the district and exclude 5G absolutely under its duty of care to protect public health. After all, the pipework and trunking already exists in the form of our telephone infrastructure to bring fibre optics to each property, in the UK we are particularly fortunate to already have such a well developed system. 5G may be considered a central government project but I believe local councils have a moral obligation to stand up for the rights of local residents and protect them from injury. At the time of writing I note that Glastonbury Council has ruled to implement the 'Precautionary Principle' due to serious concerns about the dangers of 5G, whereas fibre optic offers no such threat to our safety and in a very short time-scale could be made available to everyone. Furthermore, fibre optic promises to be much less expensive than 5G with higher speeds, greater reliability with much less maintenance. I suggest that the Council adopts a policy to promote fibre optic only as the means of Internet connection for properties where 4G should continue to provide mobile Internet connection. Within the policy 5G should be excluded absolutely due to the absence of any credible independent scientific research to confirm its safety. The health dangers of 5G due to the intense directed microwave radiation is too dangerous to allow particularly when other councils have now imposed serious restrictions upon 5G installation. Fibre optic connectivity has none of these problems or dangers.

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Individuals	Number Received	Summary of Responses (Policy SD8)
Summary of Objections	0	None received

Summary of Supports	3	Three support this policy, the introduction of broadband and fibre is important and should be available to every property. Will allow employees to work remotely, limiting travel and reducing traffic and congestion. Suggests that the policy should prioritise businesses/ commercial uses for better upload speeds.
Summary of General Comments	0	None received
Overall Summary		Overall support for this policy, the introduction of broadband and fibre is important and should be available to every property. Will allow employees to work remotely, limiting travel and reducing traffic and congestion. Suggests that this policy should prioritise businesses/ commercial uses for better upload speeds.
Council's Response		Support welcomed. The proposed approach includes the requirements for employment premises as well as residential for FTTP. The Council is working through the Duty to co-operate to maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities are engaging with the telecommunications industry including Mobile UK to produce shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk guidance on the location of base and booster stations for the 5G network, taking into account material planning considerations. Policies SD8 and SD9 set out requirements around fibre to premises and mobile network.

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Policy SD9 - Telecommunications Infrastructure

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD9	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: See also comments on SD8 re appropriate upload and download speeds for remote employment working. Provision of broadband alone may meet the policy but will not best serve the population if it is merely for entertainment use and does not prioritise business, employment and education. The siting of masts and infrastructure must be controlled whether they are necessary or not. It is possible to provide appropriate masts and infrastructure disguised as necessary to mitigate impact (there are good examples of this elsewhere in the country.)
SD9	Wilhelmy, Mr Guy (1216159)	LP173 LP179 LP372 LP374	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is now huge concern over the safety of 5G and the threat it poses to human health and well-being. There is an urgent need for the Council to take account of this concern particularly as other councils are now making decisions in response to the potential damage and injury. At the time of writing it is understood that Glastonbury Council has ruled to impose the 'Precautionary Principle' out of its awareness of the dangers of intense microwave radiation from 5G transmitters and devices. Noise and vibration that are visible or audible are only part of the problem where it is suggested that we must now consider all of the electromagnetic spectrum in terms of pollution and interference of our quiet enjoyment of our property and district.

Individuals	Number Received	Summary of Responses (Policy SD9)
Summary of Objections	1	One objection received to policy, there is no evidence that 5G is safe to be used.
Summary of Supports	1	One supports this policy, the siting of masts and infrastructure must be controlled whether they are necessary or not. Suggests that it is possible to provide appropriate masts and infrastructure disguised as necessary to mitigate impact.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised, support for controlling the siting of masts and infrastructure and to disguise where possible.
Council's Response		Comments noted.

Policy SD10 - Flood Risk & Surface Water Drainage

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD10	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree with reservations. The policy should discourage building on flood plains.
SD10	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: However, fully paved developments without green areas offer poor sustainability and greatest environmental impact. Run off has to be managed and can lead to flooding. A balance is required with appropriate planning restrictions to stop the gradual erosion of green space in the future. Changes of garden areas to hardstanding should be discouraged without appropriate compensatory planting or soft landscaping elsewhere. A maximum hardstanding percentage should be introduced. Changes of garden areas to hardstanding should be discouraged without appropriate compensatory planting or soft landscaping elsewhere.
SD10	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Infrastructure is under extreme pressure by adding blocks of housing development to existing developments. This needs to be rethought out in the light of drainage. Towns could also support 3 storey buildings as opposed to 2 storey.
SD10	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: New homes should not be built in areas that carry a flood risk.

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Individuals	Number Received	Summary of Responses (Policy SD10)
Summary of Objections	1	One objection received, raising concern over the impact of new housing on drainage.
Summary of Supports	2	Two support this policy, should discourage building on flood plains. Suggest that fully paved developments without green areas and hardstanding over gardens should be discouraged to limit potential for run off and flooding. Introduce a maximum hardstanding percentage.
Summary of General Comments	1	One comment, new houses should not be built in flood risk areas.
Overall Summary		No substantial issues raised, general support for this policy. Housing should not be built on flood risk areas. Concern over the impact of new housing on drainage. Suggest that fully paved developments without green areas and hardstanding over gardens are discouraged to limit potential for run off and flooding. Introduce a maximum hardstanding percentage.
Council's Response		Concern is noted about the potential for flood risk from surface water. The plan seeks a combined approach in order to not materially increase surface water run off including the use of permeable materials through the design policies and consideration of an appropriate drainage strategy.

Policy SD11 - Coastal Erosion

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD11	Mr Phillip Duncan (1217309)	LP384	Object	Proposed Policy SD11 The policy proposes to limit new development within the Coastal Change Management Area (CCMA). Footnote 25 states that the CCMA “can be viewed on the existing Core Strategy Proposals Maps”. However, there is no such designation on the CS Proposals Maps. The maps do show a Coastal Erosion Constraint Area, which refers to CS Policy EN11 – which the text confirms was informed by Shoreline Management Plans (SMPs) dating to 2006 -7. The Draft Local Plan refers to SMPs adopted 2012 and other studies undertaken since the SMPs were adopted. Therefore, it is expected that the Areas of Coastal Change/Erosion Constraint would be reviewed for the Local Plan 2016 – 36 and that the extent of CCMA would be clearly shown on a plan. There is a plan (Fig 5) included in the Draft LP which indicates the CCMA but it is not clear enough.
SD11	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Villages and towns on the coast and at risk of erosion and flooding should be properly protected to maintain existing communities, encourage tourism and protect productive agricultural land and wildlife
SD11	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: New homes should not be built in areas at risk of coastal erosion.

Individuals	Number Received	Summary of Responses (Policy SD11)
Summary of Objections	2	Two objections to this policy. Villages and towns on the coast should be protected from the risk of coastal erosion and flooding in order to maintain existing communities, encourage tourism and protect agricultural land and wildlife. The Coastal Erosion Zone is not included on the Proposals Map.
Summary of Supports	0	None received.
Summary of General Comments	1	One comment received, new houses should not be built in areas at risk of coastal erosion.
Overall Summary		Representations relate to the concerns over the implications of coastal erosion. Want to see the protection of villages and towns along the coast. Consider whether the Proposals Map shows the Coastal Erosion Zone clearly enough.
Council's Response		The shore Line management plan provide the strategic approach to management of the coast. The policy approach seeks to reduce risk from coastal change by avoiding in appropriate development in vulnerable areas in line with national policy. Taken together with SD12 the approach seeks to provide a framework to address coastal adaptation.

Policy SD12 - Coastal Adaptation

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD12	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree but with comments. There are now many second homes in coastal villages. Allowing development to allow roll back and people to move because of erosion is fine for local residents. Development and gradual using up of the rural countryside to allow second home owners to relocate is not a good use of limited resources. Local occupiers affected by erosion should be given priority.

Individuals	Number Received	Summary of Responses (Policy SD12)
Summary of Objections	0	None received
Summary of Supports	1	One supports the policy but suggests that coastal adaption should be for local occupiers and shouldn't allow second home owners to relocate.
Summary of General Comments	0	None received
Overall Summary		Limited comments received on this policy. Coastal adaption should be for local occupiers and shouldn't allow second home owners to relocate.
Council's Response		Disagree. Coastal adaptation is for the whole community. Occupation is not a land use planning consideration

Policy SD13 - Pollution & Hazard Prevention and Minimisation

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD13	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development itself causes pollution. All developments should have an environmental impact statement considered as part of the planning process. Noise in particular and effect on adjacent occupants, traffic disruption, dust and emissions, use of appropriate materials should all be considered. Noise from completed development (whether existing or new) should be rigorously controlled. The inconvenience of adjacent occupiers should be prevented. Developments that could potentially cause noise should have appropriate planning conditions attached to prevent that occurring. North Norfolk is one of the least light polluted counties in England. Long may this continue and a gradual erosion of this by inappropriate lighting schemes should be prevented. LED lighting with downward lighting only should be used. Schemes that allow uplighting and unnecessary light spillage should be rejected. All development should have an environmental impact statement considered as part of the planning process. Developments that could potentially cause noise should have appropriate planning conditions attached to prevent that occurring. Inappropriate lighting schemes should be prevented.
SD13	West, Dr Louisa (1210536)	LP055	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Noise and outside light control zones must be introduced in rural areas. The increasing use of ride on mowers, strimmers and hedges means there is often a constant hum in villages! Many incomers do not feel secure unless they have outside lights on during the night. Cars are being parked on green areas, including public footpaths. Dog noise and waste, including plastic bags, are increasing hazards. Noise and outside light control zones must be introduced in rural areas.

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Individuals	Number Received	Summary of Responses (Policy SD13)
Summary of Objections	0	None received
Summary of Supports	2	Two support this policy, important to minimise noise and light pollution. Suggest that development with unnecessary lighting should not be permitted. Noise and light control zones should be introduced in rural areas and all development should have an EIA.
Summary of General Comments	0	None received
Overall Summary		Overall support for this policy, especially for minimising noise and light pollution. Suggest that development with unnecessary lighting should not be allowed, noise and light control zones should be introduced in rural areas and all development should have an EIA.
Council's Response		Support noted. EIA is a process of evaluating the likely environmental impacts of a proposed project or development. The screening provisions including thresholds are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011

Policy SD14 - Transport Impact of New Development

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD14	Carr, Mrs Elizabeth (1216730)	LP395	General Comments	<p>creating green cycle paths that do not use the roads at all would be beneficial to locals and tourists. The narrow roads without footpaths are very dangerous for inexperienced or young cyclists. As there is not much that can be done to the width of roads without knocking down heritage buildings, creating green cycle paths would be an alternative. Perhaps use the disused railway network paths?</p> <p>Alternative transport is not an option for many residents. The roads are too narrow and busy for cyclists to use when trying to get to somewhere with facilities. Carrying shopping on the bus or cycling with it from North Walsham is not easy, so cars are an essential part of the infrastructure in a rural location. Should be greater consideration for the safety of locals and tourists who wish to use environmentally friendly means of transport.</p>
SD14	Swift, Mrs Julie (1216911)	LP243	Object	<p>As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). Add to this delivery vehicles to each property (from supermarkets, online shopping, oil deliveries etc.). Even small developments can soon add a large number of extra vehicle movements a day. Rural villages like Southrepps have largely single track roads or at best narrow roads that will allow two cars to pass but not two delivery vans/lorries. Extra vehicle movements on inadequate road networks (often with no pavements) threaten both vehicle and pedestrian safety. Looking at Southrepps any developments over 1-2 infill houses will be a departure from both SD 14 and Core Strategy Policy CT5, both of which say: Development will be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to its particular location. SD 14 and CT5 say Development proposals will be considered against the following criteria: · The proposal provides for safe and convenient access on foot, cycle, public and private transport addressing the needs of all, including those with a disability; · the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality; · the expected nature and volume of traffic generated by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety. Any development in a rural village, like Southrepps, cannot “reduce the need to travel and maximise the use of sustainable forms of transport” as there is little employment in the village, the bus service is inadequate, access to primary schools requires a car journey etc. It is not an easy area to live in without a car if you have children at school, a job, need to go shopping to a large supermarket, visit the doctors and so on. Most properties in the village have two cars or more. The recent Drurys Yard development in Southrepps containing 18 houses was given the requisite number of parking spaces seen to be applicable to the size of property. However, cars are constantly parked all down the access road as there are a lot more cars than parking spaces. Southrepps is a ‘rural’ village with working farms, both arable and livestock. Its road network comprises of mainly single-track rural lanes. Even the ‘main’ road through its centre is not capable of carrying two medium/large vans side by side. The figures on the Parish Councils website from the new SAM2 show over 60,000 vehicles a month are passing through the village (around 30,000 in each direction). The SAM2 also records that many of these vehicles are travelling in excess of 30mph. This volume of traffic has made the village roads increasingly dangerous for vehicle users, cyclists and pedestrians. Over half of the roads have no pavements or short stretches of pavement only. Elderly people, children, dog walkers, cyclists are experiencing 'near misses' on a regular basis. Every increase in traffic raises the danger levels within this village (and others like it). Developments in this village, therefore, cannot comply with the criteria above - they cannot provide for safe access; they cannot be served by safe access to the highway network without detriment to the locality; they cannot be accommodated by the existing road network without detriment to highway safety. Southrepps will see an increase in traffic with the proposed increase in development in Mundesley - as Southrepps is used as a cut through from Mundesley to the A149 and A140. This will put an intolerable strain on the road network through the village without</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				further development in the village itself. I agree with SD 14 (and Core Strategy Policy CT5) - but at present it is being ignored by the planners.
SD14	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP256	Object	The Policy states that: 'Development proposals will be considered against the following criteria: • Outside designated settlement boundaries, the proposal does not involve direct access on to a Principal Route, unless the type of development requires a Principal Route location.' However, paragraph 109 of the NPPF states that: 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' The provisions of the policy do not comply with national policy in this respect; they create an additional, more prescriptive requirement which cannot be justified and is not robust. As an example, Land East of Norwich Road would be accessed via the A140, which is a principal route. The proposed access onto the A140 lies within the 30 mph speed zone, some 150m south of the roundabout junction of the A140 and the B1436, and cars would be decelerating towards the roundabout north bound, or pulling slowly up the hill away from the roundabout in a south-bound direction. We do not therefore believe that there would be an unacceptable impact on highway safety of creating a new access here, or that the residual cumulative impacts would be severe. We assume that a robust highways assessment of each site nominated through the Call for Sites will be undertaken, and if, as set out in the NPPF, there would be no unacceptable impact on highway safety and no residual cumulative severe impact, sites should be given a positive rating as part of the site selection process, even if they are accessed from a principal route. The policy should be amended to comply with the provisions of the NPPF.
SD14	Hurdle, Mr David (901803)	LP066	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Point 5 under policy SD14 refers to Travel Plans for non-residential. Why not for large residential? Travel still generated! the word maximise is used about sustainable travel, in 1st sentence of SD14. So why not the word minimise when referring to car use, see my comments elsewhere? Cannot find any mention of county council transport policies, nor park and ride schemes to help minimise car use in town centres. Have I missed such references? Are you planning to consult visitors, a significant proportion of the population much of the year? If so, how? How successful has previous Local Plan been? Has it achieved the outcomes expected? Need to know when preparing this new one, i.e. lessons to learn! Travel Plans should be done for large residential developments. In 2nd bullet point of 7.20 replace 'reduce' with 'minimise'.
SD14	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should take place in areas where there is access to facilities and employment in order to limit road use. The impact of additional junctions, traffic lights and roundabouts on the flow of existing traffic should be considered. There are many examples – not necessarily in Norfolk- where a large development such as a supermarket or retail park has been allowed to have a traffic light controlled junction onto a major route causing long delays in through traffic. Inconvenience for many people on a daily basis result - all so that one business can make a profit. Development should take place in areas where there is access to facilities and employment in order to limit road use.
SD14	West, Dr Louisa (1210536)	LP058	Object	The impact of more traffic due to development around the area must considered as a whole, not just around the new development. Residents in adjacent rural areas have increasing difficulty walking due to lack of safe routes and crossing points.
SD14	Spowage, Mr Richard (1216878)	LP329	General Comments	In future development proposals there is a need to assess level of commuting outside local area to ensure wider road infrastructure is not overloaded and ensure greenhouse gases from excessive vehicle use are minimised
SD14	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The transport criteria against which development proposals will be considered to be essential. Regard for the amenity and character of the local area is paramount, as is a provision of a comprehensive transport assessment for North Walsham as a whole. No mention of accessibility within this policy. Hope to see strengthened wording here as all larger scale development has significant transport implications and should require a transport

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				assessment of the type specified. like to see a requirement for accessibility to both new or existing means of transport to be demonstrated as part of this process.

Individuals	Number Received	Summary of Responses (Policy SD14)
Summary of Objections	4	This policy received four objections. Concerns over the adequacy of the road infrastructure to deal with cars resulting from new development. Considered extra cars could threaten both vehicle and pedestrian safety. The impact of increased traffic across the District should be considered. Suggest that Travel Plans should be required for large residential schemes. One comments that restricting direct access onto a Principal Route is in contradiction with Paragraph 109 of the NPPF and cannot be justified. There is no mention of County Council transport policies or park and ride schemes to minimise car use in town centres. Specific concerns over suitability of Southrepps to accommodate more growth.
Summary of Supports	1	One supports this policy, stipulating that development should take place in areas where there is access to facilities and employment in order to limit road use.
Summary of General Comments	3	Three general comments received. The transport criteria against which development proposals will be considered to be essential. Support for cycle routes away from roads, as narrow roads are dangerous for cyclists. Suggest these could be provided on the disused railway network. Acknowledges that cars are an essential part of the infrastructure in a rural location. There is a need to assess level of commuting outside local area to ensure wider road infrastructure is not overloaded and ensure greenhouse gases from excessive vehicle use are minimised. Regard for the amenity and character of area is paramount and the provision of a comprehensive transport assessment for North Norfolk as a whole. Like to see strengthened wording as all larger scale development has significant transport implications and require a transport assessment. Like to see a requirement for accessibility to both new or existing means of transport to be demonstrated as part of this process.
Overall Summary		Concerns over the adequacy of the road infrastructure to deal with cars resulting from new development. The impact of increased traffic across the District should be considered. Suggest that Travel Plans should be required for large residential schemes. One comments that restricting direct access onto a Principal Route is in contradiction with Paragraph 109 of the NPPF and cannot be justified. There is no mention of County Council transport policies or park and ride schemes to minimise car use in town centres. Specific concerns over suitability of Southrepps to accommodate more growth. New green cycling paths away from roads would be beneficial. Need to assess level of commuting to ensure wider road infrastructure not overloaded and minimise greenhouse gases. Suggest changes to policy as considered all development has significant transport implications and should require a transport assessment.
Council's Response		Comments noted. The primary purpose of the policy is to ensure that proposals consider safe access for all modes of access and address the transport implications of that development. Consider the suggestions of requiring Travel Plans on larger proposals in the finalisation of the policy approach .

Policy SD15 - Parking Provision

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD15	Hurdle, Mr David (901803)	LP067 LP068	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: As well as cycle parking in new developments should there not be a policy of simply providing cycle parking in town centres? why not simply ensure provision of cycle parking in town centres, whether development or not?
SD15	Hurdle, Mr David (901803)	LP069 LP064	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Does the proportion reflect that north Norfolk is the UK's third highest for people aged 65+? Can this specific question please be addressed? My experience is that there is insufficient such parking. And many visitors are blue badge drivers also.
SD15	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. Parking on rural roads in villages should be discouraged. Narrow roads which fall short of current design standards for width, sightlines, footways and alignment can become dangerous if partially blocked or narrowed or sightlines are blocked by inappropriate parking. Access for residents and emergency vehicles in particular can become difficult. Parking that does not impact on access roads should be encouraged and built into the development. Parking on rural roads in villages should be discouraged.
SD15	Hall, Mr Stephen (1215856)	LP219	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Policy needs to reflect a differential between rural development and urban development. NPPF Section 9, para 105 a-e allows for a differential. To have the same parking standard in Sheringham/Cromer as in a rural village such as Southrepps does not make sense due to the lack of availability of sustainable transport. consider increase that parking standard for 3/4 bed house in rural locations to reflect NPPF considerations and local evidence
SD15	Hall, Mr Stephen (1215856)	LP218	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The current parking standards (Appendix 1) are based on evidence from over 10 years ago and need updating. NPPF para. 105 (a-e) deals with local parking standards and clearly states what should be taken into consideration. To have the same standards for parking in Cromer/Sheringham as in growth villages such as Southrepps does not make sense. Due to the lack of public and sustainable transport options para 105 c (NPPF) there is a higher requirement for private cars. To have a parking standard of 2 spaces for a 2 or 3 bed house including the garage does not make sense. Many of the houses now built have small gardens and therefore the garage is used for storage. A 3 bed house then only has one parking space with the potential for 3 or more cars requiring parking, leading to parking on the roads but more often on pavements. The Council should also adopt a policy of not allowing conversion of garages if it reduces the parking below standard requirement. Outside of the main towns which are served with good transport links the parking standard should be increased for a 3 and 4 bed properties. To adopt a policy to stop garage conversion if it means that the parking provision falls below the required current standard
SD15	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Parking Provision In our experience, adequate and well designed parking is essential to a harmonious community. We would hope to see this policy upheld and implemented.

Individuals	Number Received	Summary of Responses (Policy SD15)
Summary of Objections	2	Objections suggest that there should be a differential between development in rural areas and urban areas in line with paragraph 105 in the NPPF.
Summary of Supports	1	One supports this policy, illustrates the importance of providing off-street parking. Existing issues with narrow roads falling short of current design standards making access difficult for residents and emergency vehicles in particular.
Summary of General Comments	3	Three general comments received, calls for increased levels of cycle parking in town centres and more well designed car parking is essential for the community. To include blue badge parking.
Overall Summary		The representations on the policy dealing with parking, call for increased levels of car and cycle parking. To ensure that parking is adequate and well designed and includes blue badge parking. Highlights safety issues relating to cars parking on narrow roads and access roads and reflect the different reliance on cars between urban and rural areas
Council's Response		Noted. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car. It is considered that poorly designed schemes can lead to inappropriate parking and highway issues and appropriate provision alongside new development to minimum standards and above is necessary. The approach adopts the County Council standards.

Policy SD16 - Electric Vehicle Charging

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD16	Johnson, Mr & Mrs (1215700)	LP139	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is a fallacy that electric vehicles are the cure for traffic pollution and carbon dioxide emissions. Electricity has to be generated and all electric cars do is move the point at which CO2 is generated from car engines to a central location in the form of a power station. There is a failure at central Government level to provide sufficient future power generation capacity to meet the predicted demand from electric cars or for phone charging, smart devices and home computers Windfarms are not enough and the government has failed to make provision for the additional power generation needed. It is nevertheless important to provide appropriate connection for when the real problem of future power generation is resolved. The way to reduce pollution is to reduce traffic. That can be done by making sure housing development takes place near areas of employment and broadband is suitable for home working.
SD16	Rose, Mr Alan (1217227)	LP580	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: With the rise of electric cars, it is important that more electric charging points for vehicles are installed.
SD16	Brooks, Mr David (1217039)	LP251	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: What infrastructure is being planned in order to provide charging points for electric vehicles in the anticipation of transition from petrol and diesel transport modes. There appears to be a considerable lack of this facility in the North Norfolk area.
SD16	Adams (1215905)	LP590	Support	Every new dwelling must be provided with a private parking space on the plot associated with the dwelling with access to a secure and safe charging point
SD16	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: New homes must all have one active standard charge-point for electric vehicles.
SD16	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We recognise the need for vehicle charging points within proposals for development of all kinds and we welcome this policy. What we would like to see is the removal of the phrase where practical from the first line of the policy.
SD16	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Should ensure electric vehicle charging infrastructure for public car park use (and to incentivise businesses to do the same) as well as points for new homes.

Individuals	Number Received	Summary of Responses (Policy SD16)
Summary of Objections	0	None received
Summary of Supports	2	Two support this policy, suggest that every new dwelling should be provided with a private parking space with access to a charging point. One doesn't consider electric vehicles as the solution for reducing traffic pollution and carbon dioxide emissions as it is just moving the point at which the Co2 is being generated to a central power station. Have to reduce traffic to reduce pollution.
Summary of General Comments	5	Five general comments received. Support for the provision of electric charging points for homes and public car parks but concerns with how these will be delivered with the lack of existing infrastructure in place. Suggest changes to remove the phrase where practical from the first line of the policy.
Overall Summary		Overall support for the provision of electric charging points, but concerns with how this will be delivered. Suggest change to wording to remove the phrase where practical from the first line of the policy.

**Council's
Response**

Support noted. The provision of charging points reflects the move to providing the required infrastructure to support the wider role out of electric vehicles and the move to a lower carbon economy by 2040. The UK power generation as a whole is moving to a lower reliance on fossil fuel generation. The provision for such infrastructure is included in the Plan under SD16

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Policy SD17 - Safeguarding Land for Sustainable Transport

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD17	Walker, Mrs Kerry (1217345)	LP331 LP631	Object	Hoveton is omitted from the list of settlements where land should be safeguarded for Sustainable Transport use.
SD17	Johnson, Mr & Mrs (1215700)	LP139	Support	Agree
SD17	Ringer, Mr Callum (1218562)	LP772	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NNDC needs to be more pro-active in encouraging the re-building of the rail link in to Fakenham and also into Holt and the extension on the bittern line to serve this town, especially as it is an identified growth town. Safeguarding the track bed alone is not particularly visionary and the council should be more pro-active.

Individuals	Number Received	Summary of Responses (Policy SD17)
Summary of Objections	2	This policy received two objections. Would like to see the rail link to Fakenham and Holt reintroduced and Hoveton included in the policy list where land will be safeguarded for Sustainable Transport use.
Summary of Supports	1	One supports this policy.
Summary of General Comments	0	None received
Overall Summary		Overall support for this policy. Would like to see the rail link to Fakenham and Holt reintroduced and Hoveton included in the policy list where land will be safeguarded for Sustainable Transport use.
Council's Response		The first part of the policy already provides an appropriate response for the safeguarding of track beds in the suggested locations.

Environment Policies

Policy ENV1 - Norfolk Coast AONB & Broads National Park

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP258	Object	Policy ENV 1 states that: 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced.' The policy goes on to note that: 'Proposals for 'major development' in the Norfolk Coast Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as asset out in national policy.' Major development is defined in the Glossary of the NPPF as 10 or more dwellings. However, footnote 77 of the NPPF notes that this is 'other than for the specific purposes of paragraphs 172 and 173 in the Framework', i.e. this definition of major development does not apply in the AONB; as set out in Footnote 41 of the Plan, what constitutes major development in the AONB is a matter for the decision maker, taking into account a number of criteria. Roughton lies at the southern extent of the Norfolk Coast AONB. Our client's site, Land north of Chapel Road, Roughton, lies within the AONB. We suggest that development of 13 units on this site would not constitute major development in this context. Such a development would comply with the description of small scale development set out in Policy ENV 1; it is small scale, it would meet an identified local need for housing, and it is considered that the site does not make a contribution to the natural beauty and character of the area as it has existing development to the north and south, and is relatively contained and separated from the AONB by the sloping topography. My client's other site, land to the east of Norwich Road, lies some 120m outside the AONB. However, the indicative masterplan which has been submitted in support of the representations (Appendix B) has taken account of the presence of the AONB to the North, and has sought to minimise the visual impact of the development by creating a natural woodland buffer along the northern boundary, and by setting back the properties from the A140, with generous planting and natural drainage features.
ENV1	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV1	Mr Phillip Duncan (1217309)	LP387	Object	Proposed Policy ENV1 The approach suggested is "in the Norfolk Coast Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as set out in national policy(42)" where Footnote 42 reads..... "42 This does not apply to development sites allocated by the Local Plan because the need for those developments and scope for them to be accommodated elsewhere outside the Area of Outstanding Natural Beauty was assessed during Plan preparation." We do not consider the assessments conducted are sufficient to justify the approach proposed in Footnote 42. Our detailed comment on the Site Selection Methodology Background Paper 6 is set out in the attached analysis and feedback.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV1	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP659	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Policy ENV 1 states that: ‘Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced.’ This positive attitude to development in the AONB is welcomed. The site lies within the AONB, for five homes will be designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape. The scale and character of the properties will reflect their setting, and the associate landscaping will ensure that they integrate into the environment.
ENV1	Ringer, Mr Callum (1218561)	LP772	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to any proposal to increase the AONB due to the impact this will have on house prices and the ability to build affordable homes.

Individuals	Number Received	Summary of Responses (Policy ENV1)
Summary of Objections	3	One objected to the policy in that suitable development necessary to meet identified local housing need that does make a contribution to the natural beauty and character of the area should be allowed in the AONB. Remaining objections focused on the principle of development in the AONB , due to the impact on affordability of house prices and disagreed with the premise of allocation in the AONB throughout the plan
Summary of Support	2	Two support this policy, for the protection of the AONB. One comments that suitable development which is designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape should be allowed. Suggest that other important areas of wildlife habitat and biodiversity should be given similar protection.
Summary of General Comments	0	None received.
Overall Summary		Support received for the protection of the AONB, some suggest that suitable development necessary to meet identified local housing should be permitted under this policy. And suggest that other important areas of wildlife habitat and biodiversity should be given similar protection. One objection disputes the approach to allocations in the AONB, that assessments are not sufficient to justify these developments (Footnote 42).
Council's Response		Comments noted: National policy dictates that whether a proposal is major development in the AONB is a matter for the decision maker, taking into account its nature, scale and setting. The local Plan sets out the strategic policies - individual planning applications will be assessed on its own merits against the whole development Plan.

Policy ENV2 - Protection & Enhancement of Landscape Character

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV2	Bell, Ms Jane (1218416)	LP799	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support; I trust that the Council will be faithful to the landscape protection objectives set out in this policy, given all the pressures for building development pp. 94, 95, 96 Par. 8.22, s.23.
ENV2	Mr Phillip Duncan (1217309)	LP388	Object	Proposed Policy ENV2 refers to the Landscape Sensitivity Assessment (LSA). However we note that the LSA is not applicable to all types of development as it only considers renewables and reservoirs. Clarification needed.

Individuals	Number Received	Summary of Responses (Policy ENV2)
Summary of Objections	1	No substantive issues raised - clarification that the Landscape Sensitivity Assessment is not applicable to all types of development and only considers renewable energy development and reservoirs.
Summary of Supports	1	One comment of support received.
Summary of General Comments	0	None received.
Overall Summary		No substantial issues raised. Protection should be given to important areas of wildlife habitat and biodiversity. Clarification required as to scope of LCA and LSS.
Council's Response		Noted. The LSS assessed the sensitivity of the Norfolk landscape to the various types of renewable and low carbon development. The LCA identifies the landscapes valued features and acts as a framework for decision making that respects local distinctiveness

Policy ENV3 - Heritage & Undeveloped Coast

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV3	Witham, Mr I M (1216498)	LP201	Support	A much-needed policy for north Norfolk. Suggest add to the policy wording: "provided that the relocation would not have a significantly adverse visual impact upon the landscape of the Undeveloped Coast area".
ENV3	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV3	Johnson, Mr Jamie (1216384)	LP341 LP539	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Where it is assumed that Figure 5. page 93 will be supplemented by new Proposals Maps, the area shown shaded green as 'Undeveloped Coast' should be amended in line with the current proposals maps to show established settlements within the area which are already developed and should be recognised as distinct from the wider 'undeveloped coast' area in which they are sited. For accuracy and clarity the following settlements should be removed from the green-shaded 'Undeveloped Coast' area on figure 5 and follow the current proposals maps demarcation including Stiffkey, Cley Next the Sea, Salhouse, Trimmingham, Lessingham, Eccles on Sea including the Cart Gap to North Gap coastal ribbon, and Sea Palling.
ENV3	Mr Phillip Duncan (1217309)	LP392	Object	Proposed Policy ENV3 The Plan (Fig 5) is insufficient to clearly show the proposed area of Undeveloped Coast.

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Individuals	Number Received	Summary of Responses (Policy ENV3)
Summary of Objections	1	No substantive issues raised: Figure 5 is insufficient to clearly show the proposed area of Undeveloped Coast.
Summary of Supports	3	Three support this policy. Overall support, much-needed policy for North Norfolk. Protection should be given to important areas of wildlife habitat and biodiversity. Undeveloped Coast on Proposals Map needs to be updated to exclude existing settlements and consideration to adding to the policy wording: "provided that the relocation would not have a significantly adverse visual impact upon the landscape of the Undeveloped Coast area" .
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised. Support for policy, considered to be much-needed for North Norfolk. Protection should be given to important areas of wildlife habitat and biodiversity. Consideration should be given to amending the Undeveloped Coast on Proposals Map to exclude existing coastal settlements. Figure 5 is insufficient to clearly show the proposed area of Undeveloped Coast.
Council's Response		Noted, Consider comments in the finalisation of the policy. The majority of growth is located in those settlements identified as sustainable growth locations and as such are identified as outside the Undeveloped Coast designation. It is not appropriate to exclude smaller settlements which the policy seeks to manage appropriate development in . The boundaries will be reviewed along with the finalisation of policy SD3- settlement hierarchy. The map is an illustration, more detail can be found on the interactive proposals map on line. Consider updating policy in line with suggested policy wording: "provided that the relocation would not have a significantly adverse visual impact upon the landscape of the Undeveloped Coast area" .

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Policy ENV4 - Biodiversity & Geology

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Yardley, Mr Christopher (1218066)	LP688	Support	~I would also like to emphasize that the starting point for development should not be how to bolt on supposed 'net gain' in a specific development but to look to understand the impacts of the development on the existing site and wider biodiversity of the area ~I would also like to suggest that the policy be amended to include an additional key fourth point after 'all development proposals should' to the effect that the Council will engage with NGOs contributions towards the enhancement of biodiversity. Support additions to the proposed wording of the policy to enhance the value and meaning of the policy in line with NPPF guidance and wider community involvement.
ENV4	Spowage, Mr Richard (1216878)	LP326	General Comments	There is a need to emphasise councils duty to protect and enhance all wildlife and ensure suitable ecological information is supplied with any proposal to ensure correct mitigation is achieved both pre development, to prevent loss of species from sites, to post development ensuring long term protection and management of proposed mitigation. In addition the is need to ensure wildlife habitat mitigation is the primary aim and not part of a strategy of public open space which could be detrimental to target species. In addition mitigation needs to have regard for habitat connectivity seeking to link habitats and avoid fragmentation.
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided
ENV4	Bell, Ms Jane (1218416)	LP799	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly support the aims in paragraphs 8.22 & 8.23 and consider that those in paragraph 8.22 are of the highest importance. I am delighted to note that the 'provision of 'wildlife homes' is now an official stipulation with regard to ' development proposals'. However, I question the last paragraph (p. 96). If a 'designated site (etc.) may be adversely affected by a development proposal', why should the council consider a development application in the first place, if it is going to cause inevitable, irreversible ecological damage? That is what 'adversely affected' means. pp . 129; 135 – 137 Par. 9.49, 9.50
ENV4	Duncan, Mr Phillip (1217309)	LP396	Object	Proposed Policy ENV4 This proposes that developer contributions will be required based on “the emerging Recreational Impact Avoidance and Mitigation Strategy57” . Footnote 57 confirms that “A Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (RAMS) is currently being commissioned collectively by the Norfolk Authorities and Natural England”. We do not consider it reasonable to propose a policy based on a study which has only just been commissioned, and for which there are no proposals for public consultation set out.
ENV4	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All developments should be subject to an environmental impact assessment to ensure they minimise their carbon footprint and an equality impact assessment to ensure they benefit all residents
ENV4	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Suggest a bold new environmental initiative by NNDC to aim to make North Norfolk a red squirrel only District by the end of this planning period. It would mean building on the start made by the Holkham estate and persuading land owners and residents on the land to the south to eliminate gradually the grey squirrel. This would for a start save the National Trusts woods at Felbrigg from the appalling damage inflicted on them by lack of control of grey squirrels, and is in tune with the HMG initiative to plant more trees. Other D.C’s and counties would follow this initiative but NNDC could take most of the credit.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV4	Dixon, Cllr Nigel (1218612)	ILP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Ensure layout and land usage creates maximum habitat and area connectivity for wildlife and promotes the recreation of ecosystems essential to address part of the climate change agenda. The Plan should incorporate a requirement to involve a recognised wildlife conservation or preservation authority to both advise on the layout of major sites and become a delivery and maintenance partner.

Individuals	Number Received	Summary of Responses (Policy ENV4)
Summary of Objections	2	Two objections raised the issue of emerging evidence. Not reasonable that the RAMS evidence to support this policy has only just been commissioned. One suggests that Environmental Impact Assessment and Equality Impact Assessment should be required on all development.
Summary of Supports	4	Policy considered important to the well-being of residents, the character of the area and tourism. One remarks that development on farmland would have less impact environmentally, and that development of land that currently provides biodiversity should be avoided. One questions why if 'a designated site will be adversely affected by a development proposal', the council should consider a development in the first place.
Summary of General Comments	3	General comments received focused on the need to ensure layout and land usage creates maximum habitat and area connectivity for wildlife and promotes the recreation of ecosystems essential to address part of the climate change agenda. Suggest that the policy should emphasise the council's duty to protect and enhance all wildlife, ensure that suitable information is submitted with any proposal to ensure mitigation can be achieved. Mitigation needs to ensure habitat connectivity and avoid fragmentation. One wishes North Norfolk becomes a red squirrel only District. A wildlife conservation or preservation authority should advise on the layout of major sites and become a delivery and maintenance partner.
Overall Summary		General support for this approach, majority of comments focus on how the policy could go further to protect biodiversity; that EIAs should be required on all development, and to ensure that suitable information is submitted during the pre-application stage to ensure mitigation is achieved. No development should be permitted on sites that currently provide biodiversity and where development would have an adverse impact on a designated site. A wildlife conservation or preservation authority should advise on the layout of major sites and become a delivery and maintenance partner.
Council's Response		Noted. Support welcome. We value the enhancement of biodiversity and geodiversity and the opportunity to create/improve habitats to support wildlife through biodiversity net gain. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites. Such a requirement has been identified through the interim Habitat Regulation Assessment which is available alongside this consultation statement and is included in advice from Natural England.

Policy ENV5 - Green Infrastructure

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	Woodward, Mrs Josephine (1217427)	LP605	General Comments	Provision is to be made for the enhancement of green infrastructure and a clear definition of the provision of green infrastructure.
ENV5	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NNDC must work to lower the carbon costs of transport. It should support developing safe for pedestrians and cyclists, and cleaner buses, and delivery vehicles of all sorts. It could provide a fleet of cleaner cars for its own staff to use on council business. It could lobby for lower road speeds.
ENV5	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. See comments. Green infrastructure should be considered in terms of its overall contribution as wildlife corridors and prevent isolation of green areas in order to encourage biodiversity.
ENV5	Watson, Mr Martin (1215724)	LP118	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Many holiday-makers as well as local citizens want to enjoy the beauty of the North Norfolk countryside, keeping healthy by walking and cycling. The problem is that many of the roads that lead through the countryside are narrow and pose dangers to cyclists. There may be safe riding opportunities in campsites and caravan parks but on the open road there are many places where families cycling with children run real risks from motorised traffic. Not having safe cycling paths or tracks discourages holiday-makers with families from coming here as well as the local population from keeping fit on their bicycles. Re aims to: 'facilitate increased cycling': discrete cycle paths and tracks are needed. I would suggest that particular areas of danger are identified and efforts made to eradicate the danger. An example is: the road from Weybourne to Holt. The whole road is narrow but the main danger is at the top of the hill. There the road bends to the left as it flattens out but the sides are steep banks and do not allow a cyclist to leave the road if a large vehicle is approaching at the same time. Children especially are at risk. There are many such examples in our area which could be made safe if cycle paths were available off the roads. Cycle tracks are required. Areas of danger for cyclists should be identified and efforts made to eradicate the danger.
ENV5	Mr Phillip Duncan (1217309)	LP401 LP402 LP405	Object	Proposed Policy ENV5 and the Green Infrastructure Background Paper 5 The Draft Plan makes clear (paras 8.27 and 8.29) that the policy is informed by the Green Infrastructure Background Paper 5. However the Paper simply states that “Land allocations in Cromer seek to provide 600 homes and are outlined below” The principles offered in the GI paper are only in relation to those selected sites - The starting point for consideration of GI appears only to begin on the assumption that the sites considered are the best, not that a GI assessment is offered to inform site selection as set out in the Draft LP. This is therefore inconsistent. The approach in the GI paper appears inconsistent with the role of a Local Plan – it is suggested in regard to Cromer that “some of the formal sports pitches in the town could be considered at the threat of development as they are potentially attractive development plots within the settlement boundary” (p.13). One of the roles of the Local Plan is enabling retention of such valuable facilities – as is demonstrated in Policies SD6 and ENV7. The GI paper as an informing document appears inconsistent.
ENV5	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Cycle paths, electric public transport, green spaces for outdoor leisure need to be a part of every built area. This must be as great a priority as built space. Present constructions provide little in the way of wild space.
ENV5	North Norfolk District Council Members for North Walsham	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Vital to the health and wellbeing of the people of the District. We welcome the GI Position Statement and the GI plan for North Walsham which is contained within It, stipulates a requirement for walking and cycling paths, green corridors for wildlife and extended provision for woodland. Makes no direct reference either to Pigney’s Wood or to the reclamation of the Dilham Canal. These are vital resources for the health and

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
	Gay, Cllr Virginia (1218492)			wellbeing of our town and they deserve to be incorporated within a strong GI plan linking any town extension to the town centre and countryside. We welcome mention of connectivity as without this the policy will not be helpful either to people or wildlife. We would like to see that there is rigorous testing of any assertion that green infrastructure cannot be delivered on a proposed site. If after such testing this can be demonstrated, then enhancement and mitigation must be delivered as close to the development site as possible.

Individuals	Number Received	Summary of Responses (Policy ENV5)
Summary of Objections	5	Five objections: suggest that NNDC should lower the carbon costs of transport, provide safe pedestrian and cycle routes, encourage electric public transport and ensure that green spaces are provided for outdoor leisure as part of every built area. One objection raises concern over inconsistencies with this policy and the GI Background Paper.
Summary of Supports	2	Two support this policy and were in agreement that GI should be considered in terms of its overall contribution as wildlife corridors and prevent isolated green areas in order to encourage biodiversity. Cycle paths are needed to allow and encourage holiday makers and residents to enjoy the countryside walking or cycling. Roads are considered narrow and dangerous for cyclists.
Summary of General Comments	2	Two general comments received. GI is vital to health and wellbeing of the people in the District. Welcomes GI plan for North Walsham but makes no direct reference to Pigney's wood or Dilham Canal. Welcome more rigorous testing of whether GI can be provided, otherwise should be delivered close to the development. Suggests that a clear definition of the provision of green infrastructure is required.
Overall Summary		No substantial issues raised. Most comments highlighted the importance of GI for the health and wellbeing for residents. A number suggest that NNDC should lower the carbon costs of transport encouraging electric public transport and improve walking and cycle routes. Others suggest that green spaces should be provided as part of every built area and to prevent isolation of green areas in order to encourage biodiversity and to contribute as wildlife corridors. One seeks clarification of what green infrastructure is required.
Council's Response		Noted: agree, The plan positively promotes the provision of high quality on site GI and enhancement and improvement of the existing strategic network. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to inform future site specific requirements.

Policy ENV6 - Trees & Hedgerows

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV6	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. This is absolutely necessary to prevent the erosion of biodiversity, and to provide a network of wildlife habitat across the county and not just isolated areas. See comments on ENV1. As many trees, hedgerows, coppices, ponds and mature areas of woodland as possible should be retained. On any developed land trees and hedges should be retained and protected by planning conditions wherever possible.
ENV6	Rose, Mr Alan (1217227)	LP580	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Planting trees with new builds is also really important for the environment.

Individuals	Number Received	Summary of Responses (Policy ENV6)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy, to encourage the retention of biodiversity, to provide a network of wildlife habitat across the county and not just isolated areas
Summary of General Comments	1	One general comment received. Tree planting should be encouraged.
Overall Summary		Limited comments received and no substantive issues identified. The policy was supported and considered necessary to prevent the erosion of biodiversity and to provide network of habitat across the county. Tree planting should be encouraged.
Council's Response		Noted.

Policy ENV7 - Open Spaces & Local Green Spaces

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV7	Armstrong J (1216455)	LP368	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I set out below the 9 principal reasons why the private garden at 39 New Road should not be designated as Open Land Area. The area is private residential garden with no public access, it is separate from and different to the publicly accessible Pastures. 2. It does not fulfil the NPPF definition of “Open Space” (provided on p 69 of the NPPF 2019). 3. It does not fulfil NNDC’s definition of “Amenity Green Space” (as defined in NNDC’s “Amenity Green Space Study April 2019”). 4. It does not fulfil NNDC’s definition of “Open Land Area” (as defined in the Draft Local Plan). This definition appears to be out of line with the NPPF definition. 5. The proposed designation is based on out of date information in terms of quantity, quality and accessibility of open space. This is contrary to NPPF paragraph 96. 6. The proposed designation of this area as Open Land Area would prohibit development. Such development could be of benefit to Blakeney and its Conservation Area. 7. The limited “visual amenity” provided by the garden falls well short of that needed to justify designation as Open Land Area. 8. The garden is not part of Blakeney’s “composite green space”. (Although this may appear to be the case from a bird’s eye view.) 9. The garden itself does not appear to have been assessed in the review of open spaces but appears to have been designated as Open Land Area simply because it was deemed to be part of the Pastures which was designated under Policy CT1 in the Core Strategy of 2008 and the earlier local plan. the garden at 39 New Road should not be part of proposed designation OSP154 because it is separate from the Pastures and the garden itself offers no public access. .</p> <p>2. It does not fulfil the NPPF definition of “Open Space” The NPPF definition of “Open Space” is “All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.” Thus, the NPPF definition of open space requires an area to be “of public value” and to “offer opportunities for sport and recreation” and able to “act as a visual amenity”. The garden at 39 New Road falls well short of this definition as there is no public access and, therefore, no opportunity for sport or recreation. The ability of the area to “act as a visual amenity” is greatly restricted by the hedges along Little Lane and New Road which border it. Further examination of the “visual amenity” is provided below at point 7. In summary, the garden does not meet the NPPF criteria of “open space” . . 3. It does not fulfil NNDC’s definition of “Amenity Green Space” as defined in NNDC’s “Amenity Green Space Study April 2019” (AGSS) NNDC does not provide a clear definition of “Amenity Green Space” in its AGSS, however, it provides guidance as follows: § p 3-4 says: “For the purposes of this review, the Amenity Green Space designation includes; public & privately owned accessible open space, churchyards, village greens, allotments & urban woodlands.” § p 5 goes on to say “very small areas of open space... generally have been discounted from designation, with protection confined to those larger areas of land that contribute to the character of a settlement and provide functional open space.” In other words, the NNDC definitions emphasise access and function. Clearly the garden does not meet these criteria. In summary, the garden at 39 New Road does not fulfil NNDC’s definition of “Amenity Green Space” . . 4. It does not fulfil NNDC’s definition of “Open Land Area” (as defined in the Draft Local Plan). This definition appears to be out of line with the NPPF definition. - . It does not fulfil NNDC’s definition of “Open Land Area” (as defined in the Draft Local Plan ENV7).Whether a parcel of land makes “an important contribution to the appearance of an area” is clearly subjective. Further it is impossible to argue that any piece of land does not make a contribution to the appearance of an area (though the contribution may be good or bad). I would make the following points in respect of this definition. - The NNDC Open Space Standards 2008 recommends a village of Blakeney’s size (population 801 at the last Census) should have about 4 hectares of open space of various types. Blakeney has almost 9.5 hectares. § Blakeney has more than the recommended amount of open space in each of the categories listed in the NNDC Open Space Standards. The categories are: public park, children’s play, playing pitches and natural/semi-natural green space. § Blakeney enjoys high quality recreational open spaces, including flood lit tennis courts, BMX track, young children’s and</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>teenage children’s play areas in addition to playing fields and more natural areas for information recreation. § In total, Blakeney has approximately 233% of the amount of open space required under the NNDC Open Space Standards. Furthermore, Blakeney is surrounded by vast areas of accessible coastal and rural open space including Blakeney Harbour, the Coast Path, Blakeney Point, Wiveton Downs, Friary Farm, to name but a few! When the promised study is completed, it will confirm that Blakeney is extremely well served in terms of open spaces. An area like the garden at 39 New Road, which provides, at most, a degree of visual amenity, is likely to be deemed “surplus” in the context of Blakeney’s rich and plentiful open spaces. Conclusion I would conclude my comments by saying that the garden at 39 New Road should not be designated as an Open Land Area (either as part of the Pastures OSP154 or as a separate designation) for the following reasons: § It is private residential garden with no public access. § It does not meet the criteria of the various definitions of open space (neither NPPF nor NNDC) § NNDC’s assessment has been based on out of date information. § The designation would prevent development which could strengthen the character of Blakeney’s built environment. § It provides only minimal “visual amenity” to the surrounding area. Development would not reduce the contribution it could make. § It is not part of a “composite green space”. § It does not appear to have been impartially reviewed as an open area but has been carried forward from previous plans.</p>
ENV7	Armstrong J (1216455)	LP365	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. NNDC have misinterpreted the NPPF guidance in respect of assessing potential Local Green Space The NNDC Amenity Green Space Study, April 2019 (AGS) provides details of how NNDC went about reviewing its policies in relation to the provision of new, and the protection of existing, green spaces of various types. Communities were invited to nominate areas which they felt should be considered for designation as Local Green Spaces. (See Appendix D of AGSS which shows the letter sent to all Parish and Town Councils in July 2017). There appears to have been no consideration as to whether these existing open land areas might be “upgraded” to Local Green Space nor to the fact that these “existing designations” themselves were under review. In summary, the AGSS explains that Local Green Space offers the highest level of protection which is reserved for green areas within settlements which are the most important to the local population. It cannot be correct that our beautiful district has only 7 such green areas 6 of which are ponds! I believe that through a combination of misinterpretation of NPPF policy and poor assessment process, NNDC has failed to give the population of North Norfolk the opportunity to award the highest level of green space protection to the most valued, demonstrably special, open spaces. Thus the Open Space & Local Green Spaces Policy ENV 7 is contrary to the NPPF.</p>
ENV7	Walker, Mrs Kerry (1217345)	LP331, LP668	Object	<p>~there is an inconsistent approach between NNDC and the BA in relation to the designation of open space in Hoveton. ~suggested the inclusion of three sites in the NNDC Amenity Open Space Review. hat NNDC include Riverside Park, Pocket Park and Granary Staithe as Amenity Green Space in the 2016-2036 Local Plan. That NNDC recognise its duty to co-operate with the BA and for the 2016-2036 local plan recognise its responsibility in setting a strategic vision for the sustainable development Hoveton's riverside. The removal of oversight and management of pubic open space situated in the areas of Hoveton which currently sit with the Broads Authority area.. In the absence of removal of open space responsibility from the Broads Authority an agreed policy approach between the two authorities to the strategic and operational management of PoS in Hoveton in the overlapping areas.</p>
ENV7	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP259	Object	<p>The policy requires that developments of 11 or more dwellings contribute to the creation of new and enhanced Open Space. I confirm that both my clients’ sites would, if allocated, provide policy compliant contributions to open space provision, proportional to the scale and form of the proposed development.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV7	Spowage, Mr Richard (1216878)	LP325	General Comments	Any large development should include large areas of managed open space specifically to meet peoples varying needs - often linked to health and wellbeing. I wish to see a commitment for each urban centre to create new large parks to meet growing population needs.
ENV7	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree with comment. Policy SD13 should not be compromised by this.
ENV7	Mr Phillip Duncan (1217309)	LP407	Object	Open space and Proposed Policy ENV7 Para. 8.34 makes clear that the NPPF requires policies to be based on “robust and up to date assessments of the need for open space, sport and recreational facilities and opportunities for new provision” However, Para 8.38 of the Draft LP confirms that the policy approach is “based on the current Core Strategy approach” and that “an updated qualitative and qualitative (sic) study” is not expected to be drafted until later in the year. The Core Strategy was prepared using an Open Spaces study completed in 2006. Therefore the policy proposed in ENV7 appears premature and unreliable as it is not supported by robust and up to date evidence. This has a knock-on effect to town proposals where it is proposed to include within settlement boundaries (identified now) open land areas – yet the need is not yet known, hence the settlement boundaries should not yet be considered.
ENV7	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 3) No housing etc. on school and other institution land should reduce the amount of space for recreation/playing fields etc.
ENV7	Hall, Mr Stephen (1215856)	LP216	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The current standards do not reflect the national standards as required by the NPPF. No mention is made of the word 'wellbeing' or 'health benefits' and this should be included to reflect the NPPF S8 para 96. The benchmark used for local standards should be the Fields In Trust benchmarks/guidelines for quality and quantity as a minimum and this should be stated somewhere within the policy or evidence. This will help ensure that developers understand their obligations. It should be recognised that when applying these benchmarks, local features and obstacles to pedestrian and cycle movement should be taken into account. In doing so, accessible and sustainable play and sport facilities will be maximised. It is not acceptable for Developers to say for instance that there is a play area within 800 metres if it is the case that a footpath is poorly maintained or not suitable for access by disabled or young children with pushchairs. 'Accessibility' in the wider sense of the word and inclusion for all should be a driver in enhancing social interaction, health and wellbeing and provision of equipment and standards. Provision for people with disabilities should also be included in the standards. North Norfolk being a rural area should seek to enhance Village and Countryside Provision with regards to Children's outdoor Play facilities NNDC should have within its policy that developments under 10 residential units should still contribute towards local infrastructure. The proposal to allow 'growth villages' to accept developments of 0-20 will be misused by small developers. 10 applications for 10 houses will have the same affect as 1 application for 100 houses yet they will not contribute towards local infrastructure or to the wider community.
ENV7	Emerson, Mr Peter (1209611)	LP003	Support	Just been to the NNDC display at the Sheringham Community Centre and spoke to your representatives. I was pleased to notice that Weston Terrace Allotment site was included in the Open Spaces as this is not only a good community space but also a magnet for wildlife. I have seen over the years over 50 species of birds either feeding, nesting or hunting on this small patchwork of gardens.
ENV7	Bell, Mrs Hilary (1209650)	LP004	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Pleased to see that the Weston Terrace Allotments have been designated as an open Space and not building land. This area is a haven for wildlife - birds, butterflies, pond creatures and small animals and as such is an important habitat.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV7	Terrington, Mr Peter (1215743)	LP155	General Comments	It is essential to protect the view, across the marsh, of The Parish Church. It is one of the most evocative an iconic views in the town. Any form of development on this marshy site must be prohibited and the open space preserved. Other iconic views, over the saltmarsh, to the north of the town are not protected from development by the open space designation. Only three relatively small areas, enjoying these views remain, others having been lost to development during the course of the current LDF. The three surviving areas of open space are: The Wells Sailing Club dinghy Park, opposite the sailing club. The Former Public Drying Grounds. East of the Shipwrights. The Main Quay, between Freeman Street and East Quay. The WSC Dinghy Park is leased from the NNDC and is open to the public access. The area offers magnificent views across the channel and salt marsh. NNDC is proposing to dispose of this area creating a significant risk that future development could take place. The Former Public Drying Grounds are partly owned by NNDC but significant areas of former public space has been lost through registration by Adverse Possession and has been developed for private car parking. The area is now divided into smaller plots. It is believed that some remain unregistered. There is a significant risk that further development of this former public land will occur if it is not designated as an Open Land Area. The Main Quay has historically been open to public access and the area was enhanced by the demolition of some buildings by the Wells UDC some 50 years ago. The area is used for car parking and the storage of fishing gear, but in recent years the paraphernalia associated with these uses has significantly changed the nature of this open space and reduced its landscape value. There is a significant risk that further inappropriate development could occur unless the area is designated as an Open Land Area. Designation of the Dinghy Park, Former Public Drying Grounds and the Main Quay as Open Land Areas.
ENV7	Hall, Mr Stephen (1215856)	LP217	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: See rep ID P216 . Plus additional comments: Open space and play provision resonates with national planning policy, in particular the presumption in favour of sustainable development, the promotion of its economic, social and environmental roles and the seeking of positive improvements in the quality of the environment, and people’s quality of life. In promoting healthy communities, access to high quality open spaces can make an important contribution to health and wellbeing. Open space also plays an important role in meeting the challenge of climate change and flooding through integrating Sustainable urban Drainage Systems (SuDS) and providing opportunities for conserving and enhancing the natural environment. To change the wording with EN7 to ensure that greater importance is reflected within the Local Plan in particular relation to Wellbeing and Health with Communities for the provision of formal and informal Open Space.

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Individuals	Number Received	Summary of Responses (Policy ENV7)
Summary of Objections	5	Objections focussed on concern that the approach should be more joined up with the Broads Authority in relation to Hoveton and the provision of Open space. Others focused on the opposition to specific designation for a variety of reasons including reliance on outdated assessments that underpinned the current Core Strategy and that parts of a wider site should be removed as they are private. The settlement boundaries should not be determined at this stage as the open land areas are not known yet. One suggests that no housing should be allowed on educational recreational land. One objects to the lack of designated Local Green Spaces.
Summary of Supports	3	support for the inclusion if allotments
Summary of General Comments	5	Three general comments received. Seeking reference to ‘health and wellbeing’ as mentioned in the NPPF (para 96). The benchmark used should be the Fields In Trust benchmarks/guidelines for quality and quantity as a minimum and this should be stated in the policy. The provision of children’s outdoor play facilities should be sought and developments under 10 residential units should still contribute towards local infrastructure. The proposal to allow

		'growth villages' to accept developments of 0-20 will be misused by small developers. Open space provides a number of benefits and plays an important role in meeting the challenge of climate change. All large development should include large areas of managed open space specifically to meet peoples varying needs - often linked to health and wellbeing.
Overall Summary		Recognise that Open space provides a number of benefits and plays an important role in meeting the challenge of climate change and health and wellbeing. Raise concern that the policy is based on a 2006 study and therefore the settlement boundaries are premature when the need for open land areas is not known. Suggest changes to include the wording 'health and wellbeing' as stated in NPPF and mention the benchmarks which have been used. Suggest that all large development should include large areas of managed open space specifically to meet peoples varying needs and provide children's outdoor play facilities. Concerns that allowing 0-20 houses in Growth Villages might be misused by small developers. Concerns that developments for fewer than 10 houses will still have an impact and should contribute towards local infrastructure. No housing should be allowed on educational recreational land and that there should be more open space designated as LGS. Some challenged the designation of private amenity land as part of the wider open space designation.
Council's Response		Noted. Limited substantive issues+H15:J20 raised, some challenges to the continued designation of sites. Disagree (partly). Consider feedback in the development of this policy, the designation of sites and finalisation of appendix 2. Designated sites are identified on the proposals map, town strategy maps . The review, assessment and designation of open space sites is supported by updated evidence contained in evidence library in the 2018 Amenity Green Space Study and includes all those sites submitted by the local community of reassessment (parish and town councils) . The policy itself provides support for and the creation of designated and non-designated open space and the maintenance of visually and functionally important open spaces in both public and or private ownership . Evidence contained within the North Norfolk Open Space and Sport Recreation study 2019 will be used to inform future site specific requirements and update appendix 2.

Policy ENV8 - Public Rights of Way

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV8	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP260	Object	Policy ENV 8 states that; 'New development should create convenient attractive links with development and to the surrounding areas, assist with creation and a network of accessible green space and provide links to public transport and walking and cycling networks.' A public footpath (Roughton FP15) lies along the eastern boundary of Land east of Norwich Road. The indicative masterplan, which is submitted in support of these representations, demonstrates how a link will be provided from the site onto the footpath, creating a highly permeable development which can be fully accessed by pedestrians, and providing a pedestrian link to the village and the church.
ENV8	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. Recent issues surrounding access to the coast as a result of some national policy have caused concern. There are issues regarding access in certain areas of wildlife habitat and disturbance by inappropriate behaviour, noise and dogs. Organisations such as National Trust and NWT try to strike a balance between access for all at certain times of year and restricted access at other times to prevent wildlife disturbance or habitat erosion, especially where endangered species are concerned. Consultation with these and other experienced organisations or bodies is essential in developing a policy.

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Individuals	Number Received	Summary of Responses (Policy ENV8)
Summary of Objections	1	One objection received. Promoting a site in Roughton, that could provide links from the site to footpath (Roughton FP15) providing a highly permeable development fully accessible by pedestrians to the village and church.
Summary of Supports	1	One supports this policy, but also raises concerns over the potential impact on certain areas of wildlife from disturbance by inappropriate behaviour, noise and dogs. And suggests that consultation with National Trust and other experienced organisations is essential.
Summary of General Comments	0	None received
Overall Summary		Generally supportive of policy, but also raise concerns over the potential impact on certain areas of wildlife habitat from disturbance by inappropriate behaviour, noise and dogs. Consultation with National Trust and other experienced organisations is essential.
Council's Response		Noted: agree, The plan positively promotes the provision of high quality on site GI and enhancement and improvement of the existing strategic network including public rights of way. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and provided enhanced mitigation measures through partnership work.

Policy ENV9 - High Quality Design

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV9	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. See comments Larger properties and/or second homes built by individuals along the NN coast on infill sites are in many cases very poorly conceived and detailed, use inappropriate materials, are of unsympathetic character, too large and in no way serve to enhance the character or appearance of the area. We would welcome a policy to prevent the proliferation of such unsympathetic development.
ENV9	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Problem occurs with owners of larger gardens selling off part of the garden for development. In many cases this alters the character of the village / town by gradual urbanisation and constitutes a loss of green space / habitat and would contravene several of the ENV policies. We would like to think that this policy would prevent the proliferation of unsympathetic development.
ENV9	Cuthbert, Mr Andrew (1218313)	LP702	Object	When planning a village development, thought must be given to where vehicles are to be parked. In this modern age garages are an unnecessary extra building cost BUT off-the-road space for two vehicles per dwelling must be allowed for. ~More attention to detail by District Planners should be given to make sure developers use traditional material , skills and design commensurate with the local surroundings whether they are in an area of outstanding natural beauty or just plain North Norfolk.
ENV9	Drury, Mrs Margaret (1210793)	LP086	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I am not against innovative design, we have enough Norfolk Homes identikit houses. These measures will put up the cost but the climate demands it and incomers from other areas often sell property for way above the cost of houses here.
ENV9	Rayner, Mr Andrew (1217466)	LP635	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Build quality:- I hope the design and build of any new homes will be carefully considered as most developers seem to have a design identikit which does not include the local vernacular. They should all exceed current sustainability targets. Any design guidance should be enforceable.
ENV9	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This policy is essential to North Norfolk District Council's proposals for North Walsham and we have drawn attention to this in our introductory comments. We appreciate that this policy demonstrates the way in which it is not simply one policy but a collection of policies which is required to support a well designed development. We would not like to see any weakening of this draft policy.

Individuals	Number Received	Summary of Responses (Policy ENV9)
Summary of Objections	2	Two objections received. Design of buildings should be of traditional material, skills and design in keeping with the location whether in the AONB or not. Developers seem to have a design identikit. Consideration should be given to car parking on developments in villages; garages are unnecessary but off-the-road space for two vehicles per dwelling must be allowed for. Development should exceed current sustainability targets and design guidance should be enforceable.
Summary of Supports	2	Two support this policy. There is concern expressed about newly built infill dwellings along the coast and about the loss of residential gardens to development.
Summary of General Comments	2	Two general comment received, these measure will put up the cost of houses but is needed. Important for North Walsham - would not like to see any weakening of this draft policy.
Overall Summary		No substantial comments received or issues raised. There is support for a strong design policy. Some consider that design of buildings should be of traditional material, skills and design in keeping with the location whether in the AONB or not and concern that developers seem to have a design

		identikit. Consideration should be given to car parking on developments in villages; garages are unnecessary but off-the-road space for two vehicles per dwelling must be allowed for. Development should exceed current sustainability targets and design guidance should be enforceable. There is concern expressed about newly built infill dwellings along the coast and about the loss of residential gardens to development.
Council's Response		Comments noted. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk. In conjunction with the emerging Design guide SPD, the purpose of this policy is to provide a set of design principles which when followed will result in improved design and ensure the special character and qualities of North Norfolk are maintained and enhanced.

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Policy ENV10 - Protection of Amenity

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV10	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. Essential. Particularly in respect of noise, disturbance, and erosion of the character of a place.
ENV10	West, Dr Louisa (1210536)	LP059	Object	The redevelopment of farm buildings adjacent to other peoples homes for second home/holiday lets must be considered.
ENV10	Adams (1215905)	LP588	Support	Road traffic noise is one of the most common causes of dissatisfaction with housing. The loss of amenity and adverse health effects of road traffic noise should be specifically covered. Housing should not be built close to busy roads and where at all possible an agricultural buffer should be maintained between main roads and residential development. This policy would not only provides a better living environment for the residents but also reduce the visual impact of the development. If it is the Councils aim to provide the best possible housing in the best possible environment for the benefit of its residents then consideration of the impact of road traffic noise on homes and gardens must be up there at the top of the list. Include in the list "the impact of traffic noise on homes and private amenity space"

Individuals	Number Received	Summary of Responses (Policy ENV10)
Summary of Objections	1	One objection received, raises concern over the redevelopment of farm buildings for second home/holiday.
Summary of Supports	2	Two support this policy, particularly in respect of noise, disturbance, and erosion of the character of a place. Suggest that this policy should consider the loss of amenity and adverse road traffic noise on new housing. Buffers should be provided between new housing and busy roads.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised. Buffers between roads and new residential development should be considered in the finalisation of the policy.
Council's Response		Noted: Consider the specific reference to the step back of residential development and buffers from main roads as a consideration in the finalisation of this policy and the inclusion in the list "the impact of traffic noise on homes and private amenity space"

Policy ENV11 - Protecting and Enhancing the Historic Environment

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV11	Carr, Mrs Elizabeth (1216730)	LP385	General Comments	More emphasis needs to be made of the historic buildings in the area especially the churches. Church trails following bus routes, footpaths, cycle routes, etc. that are clearly marked would energise the local economy/community and provide more tourism to the area. Places that have been used in films are also potential sources of tourism.
ENV11	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP264	Object	<p>We note the requirement of Policy ENV 11 that development proposals that would affect the significance of a designated or non-designated heritage asset and/or its setting, or any known or possible archaeological sites, will be required to provide, in the form of a heritage statement, sufficient information proportionate to the importance of the asset and the impact of the proposed development, to enable any impact to be accurately assessed.</p> <p>A pre-application advice request was submitted to the Council in 2018, for 50 units on Land east of Norwich Road. The Historic England response stated that ‘developing the agricultural field would change the setting of the Grade II* listed building in a ‘fundamental way’, resulting in a harmful impact on the ‘historic significance of that building though inappropriate development in its setting.’ However, the Council’s Conservation officer noted that the harm must be classified as ‘less than substantial’ for NPPF purposes, and the harm should therefore be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Taking account of the pre-application advice request received, the number of units proposed on the site has now been significantly reduced, to reduce the impact of the proposed development on the heritage assets. The revised scheme for the site only looks to accommodate 20 homes, rather than the 50 originally proposed. The indicative masterplan, which is submitted with the Call for Sites form and with these representations therefore shows;</p> <ul style="list-style-type: none"> • A significantly reduced footprint of the proposed development, which is now focused in the north western part of the site, away from the setting of the church, to retaining an open agricultural field between the proposed development and the church; • Land is available for the use of the church (which is already used for informal car parking occasionally) to the south of the site; • The density of the development has been reduced; • The form and layout of the site is now much less compact, and has significantly more landscaping and open space provision within the site; • A view of the church has been created from the north west corner of the site down a tree-lined avenue through the development; this axis also provides a footpath and cycleway into the site; • The proposed vehicular access has been relocated slightly further south on the A140 so that it does not impact on the Grade II listed property Strand Cottage. Any impacts on heritage have therefore been carefully thought through and addressed. <p>Further, if the site is allocated in the Part 2 Plan, a full heritage and archaeology assessment will be carried out, to inform future iterations of the layout of the site.</p>
ENV11	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree
ENV11	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: As representatives of a historic market town with a conservation area which covers our town centre, we are extremely sympathetic to Policy ENV 11 and we welcome the resumption of conservation area appraisals for the District as a whole. We would not like to see any weakening of this draft policy.

Individuals	Number Received	Summary of Responses (Policy ENV11)
Summary of Objections	1	One objection received in relation to application advice and with regard to a specific site.
Summary of Supports	1	Agree.
Summary of General Comments	2	Two general comment received wishes to see an increase in emphasis/protection of existing historic buildings. Welcome this policy and welcome the resumption of conservation area appraisals for the District. Would not like to see any weakening of this policy.
Overall Summary		No substantial issues raised. General comments received supported the approach.
Council's Response		Noted

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Housing Policies

Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Amey, Peter (1209779)	LP011	General Comments	Before permitting further development in and around the Hoveton area consideration must be given to the ever increasing traffic flows through the village. This is a tourist area and the main A1121 is one of the worst areas of pollution in the county caused by the slow moving and often stationary traffic belching out fumes for the tourists to inhale whilst they walk around the shops, cafes and other amenities. More houses means more people and thereby more cars resulting in more noxious gases. It is not just the building development in Hoveton that is the problem but any development north of Hoveton that wishes to travel to Norwich or connect with the NDR. To keep poisoning residents and tourists alike is unacceptable and the problem needs to be addressed before any further development takes place
HOU1	Alexander Mr & Mrs (12118472)	LP782	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: My husband and I believe this development of 2000 houses on Farm land is a big mistake. Firstly in North Walsham we have not got the infrastructure at the moment to deal with the amount of people who are here now examples; doctors, dentists, home care, schools, hospitals, road structure, drainage and electric supply. Secondly we should build council homes for the waiting list of people in the area. They should be built on brown sites and owned by the council so they are affordable. We need the farm land to produce food for the country, why put profit for the few over the wellbeing of the community. - Most of the houses being built will be for outsiders coming into the area, not for the youngsters who live here and want to have a decent home with reasonable rent or houses to buy which they can afford. Also for the elderly downsizing homes that would improve their life. Also where are the jobs for the influx of people coming into the area?
HOU1	Cheeseman, Mr Alan (1218485)	LP677	Object	The proposed plan to build over 2000 new houses in the area is a serious misjudgement. To add an extra 2000 + households to the area would increase the population by almost 50%! The current infrastructure of the town will not be able to support this number of people. An influx of a great many more residents would mean increased traffic and movement of people in an area that already has a 'poor' system of roads. environments and habitats for our flora and fauna changed and lost forever. The area would benefit the community if it was used for sustainable agricultural food production, employing local people to manage it. There appears to be no apparent attempt to address the ever- present threat of climate change.
HOU1	Carr, Mrs Elizabeth (1216730)	LP438	General Comments	<ul style="list-style-type: none"> • Whilst second homes/holiday homes may stand empty for some of the time and may not contribute to the local economy they do ease the strain on the local NHS and traffic on local roads...insisting on full time occupancy for new build homes would help ease the 'community' situation but increase problems with lack of provision of infrastructure. • With larger new build executive 'second' homes, a way of deflecting ownership away from absent owners towards full time occupancy would be to increase the size of the garden. Make affordable homes more affordable. Restrict some new housing developments to full time occupancy.
HOU1	Cole, Mrs Teresa (1209821)	LP029	Object	I note in your Planning Minutes of October 2018 that the " latest household projection figures published in September had indicated a dramatic fall in population and household formation which suggested that lower housing targets in the Local Plan would be defensible The Government was revising its methodology as the projections suggested that the required number of dwellings would be less than the Government's policy position. Based on the figures, the Council's target had fallen from 520 dwellings per year to 438 per year, which would result in 8,700-8,800 new dwellings in the Plan period instead of up to 11,000 which had been agreed at the last meeting. " remove the allocation for development of the land at Runton Road/Clifton Park from the proposed draft plan

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Cook, Mr Geoff (1216625)	LP209	Object	Sustainable Development I would question the need to provide up to 11000 more homes in North Norfolk with a projected increase in population of 10000 people, especially when more people are dying than are being born in the district. If the average number of people per house is 2 only 5500 houses would be needed and new developments and planned developments should reduce the number even further. It is unclear whether the proposed number of houses could even be built – “Council needs to consider deliverability of 30% more houses per year than currently” The plan needs to be consistent with the percentage of the older population (in 2011, 58% of the population was over 45 but in 2036 40% will be over 65) as this will clearly affect the planning assumption that the older population will increase and what housing is required.
HOU1	Witham, Mr I M (1216498)	LP348	Object	The housing target is excessive, with too great an emphasis being placed upon projected figures for migration into the area from elsewhere in the country. I advocate a complete re-think, on the part of both the district council and Central Government, on the principle of working-in such a high projected figure of in-migration into Norfolk and this district, from other parts of the country, in the housing allocations.
HOU1	Young, Mr David (1210531)	LP051	General Comments	~Concerns regarding the impact of second and holiday homes on the housing supply and market. ~the occupants are not in situ for long enough to make any meaningful contribution to the life of the local area ~prices have escalated to a level far beyond the dreams of most local young families or individuals ~villages are in danger of atrophying to the extent of becoming "ghost towns" in the off season and their long-term viability being precarious. ~it is tempting to suggest the St. Ives option, under which all new-builds are for permanent residence only. In the context of North Norfolk, one could go further and require such permanent residents to have a "local connection" as per the Local Lettings Agreement, or at least such a connection to North Norfolk as a whole. Such a restriction would not need to apply to the whole of North Norfolk: perhaps only the coastal strip between Wells and Weybourne, or to the coastal AONB.
HOU1	Symonds, Ms Ann (1209801)	LP208	General Comments	Since Beeston Regis is in close proximity to Sheringham and services and amenities are shared Beeston Regis could be considered for overflow if Sheringham or Cromer become over burdened, or at least provide a more ‘rural’ form of residential development for those not wanting to be located in a town setting. Land in Beeston Regis considered as countryside should be considered for eco developments and green living options. The environment and landscape could dictate what type of sensitive development or other use takes place. By decentralising development it would relieve transport congestion and other issues faced by a growing population in the coastal areas.
HOU1	Swift, Mrs Julie (1216911)	LP249	Object	I believe that we are overdeveloping North Norfolk and I believe that could detrimentally impact our tourism, which is a large part of our economy. Towns like Holt and Cromer are thriving tourist towns. However, the majority of tourists come here to see the lovely market towns and villages with their brick and flint properties. They do not come to see sprawling housing estates that look exactly like the ones around London or in the Midlands. Mass produced designs that do not reflect the character of the area. Also the number of estates being built is already affecting the road network. Towns like Cromer are grid locked outside of the tourist season these days. People could stop coming the area due to the overdevelopment and poor designs of development and the Highways problems caused by all this development (no one wants to spend half of their holiday sat in a traffic jam through Cromer). What happens to the local economy if tourism decreases? The holiday homes will be sold flooding the market. We could end up in a depressed area with a mass of empty decaying old and new properties alike. I do not know where all these extra people are coming from to fill these thousands of new properties. Are they moving from old traditional properties? If so will they become holiday homes or even worse empty shells? I feel that NNDC are failing in their duty to protect the character of this lovely area in which we live and they are failing to consider Highway safety in the area as we do now have the road network to support this constant development proposed. Seeking a more sensitive approach to development in North Norfolk, with thought given to design and to the road networks in the area.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Swift, Mrs Julie (1216911)	LP248	Object	Southrepps is a 'rural' village with working farms, both arable and livestock. Its road network comprises of mainly single-track rural lanes. The main road through the village is regularly used as a cut-through to the A149 and A140 from Mundesley. The 'main' road through the centre of Southrepps is not capable of carrying two medium/large vans side by side. The figures on the Parish Councils website from the new SAM2 unit already record over 60,000 vehicles a month passing through the village (30,000 in each direction). The SAM2 unit also records a high percentage of these vehicles travelling at speeds in excess of the 30mph speed limit. Further development in Mundesley will increase these traffic numbers further and will put an intolerable strain on the road network through Southrepps and will endanger vehicular and pedestrian users of these roads. I am seeking a more sensitive approach to development in North Norfolk, with thought given to design and to the road networks in the area.
HOU1	Swift, Mrs Julie (1216911)	LP247	Object	I am seeking a reduction in the number of new houses planned for Mundesley due to the impact it will have on the local area roads. As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). At an absolute bare minimum 2500 houses will generate a minimum of 17,500 car movements per day. The one way system through North Walsham is not designed to handle these volumes of traffic. It isn't just the cars - its the associated delivery vans etc. that will be visiting the properties as well. North Norfolk does not have the infrastructure to take this level of development. Also where will the occupants of these 2500 houses work? There is not enough employment in the area to sustain this level of increase. Creating employment areas is not enough - the brownfield site by Waitrose has been an eyesore for 20 years or more s no big companies want to be based here. Are we now going to be a housing area for London commuters? People who will not support the local area? Where are all the occupants for these houses coming from?
HOU1	Swift, Mrs Julie (1216911)	LP246	Object	I am seeking radical changes to bypass Cromer Town Centre for vehicles and a drastic reduction in the number of houses proposed. The roads cannot cope. A bypass however, will not help the lack of doctors available. For this I seek a reduction in the houses proposed. I work on the main road through Cromer and have done for 16 years. In the past during the "peak tourist" times like Easter and the Summer School Holidays the main road outside my office regularly ground to a halt due to the volume of traffic and getting into and out of work was difficult. However, outside of these peak times traffic flowed reasonably well. However, now the traffic is continually crawling through Cromer all the time. There are regularly queues to get through the town...and this is before the peak tourism traffic hits. The development up the Roughton Road has definitely had a noticeable impact already. As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). The Local Plan wants to add almost 600 extra houses - even at its bare minimum this would generate over 4,000 extra car movements per day through Cromer. In reality it would probably be nearer to 5,000+. The roads will be permanently grid-locked and in peak tourist season no one will be able to get into or out of the town. People who work or live in Cromer simply will not be able to get into or out of work/home. It isn't just the roads. The Doctors surgeries in the area cannot cope with more people. My husband has a heart problem and had to wait two weeks to see his doctor to discuss concerns he had with his health. This will only get worse with 600 new properties...adding thousands more people to the Doctors patient lists. It is no use building more surgeries if there are not the Doctors to fill them. Cromer surgery has lots of empty consulting rooms but cannot get the Doctors to work in them. Cromer does not have the infrastructure to deal with the planned increases in housing.
HOU1	Faulkner, Mr Anthony (1216674)	LP532	Object	Provision for new housing in the coastal parishes such as Blakeney should not include market housing but should be limited to affordable housing only, for which there is a great demand, due to the low level of pay in these areas compared with the high cost of property. Market housing is likely to largely, or entirely, be used as holiday homes and will not therefore contribute to the national need for permanent housing. Development in these parishes should be for affordable housing on exception policy land where the future use as affordable is guaranteed. This would keep down the cost of the land allowing housing associations to be able to fund the cost of building without the need for subsidy from market housing. Market housing should be allocated

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				to towns where there is opportunity for work, or inland villages on, or near, public transport routes to employment centres. These villages will benefit from some development, helping to retain shops, surgeries and other amenities and the houses are likely to become permanent residences, unlike those in the coastal parishes. Remove the allocation of market housing from the coastal parishes such as Blakeney. Select smaller sites for affordable housing on exception policy land, perhaps for groups of six to ten houses. Possible sites would be on part of BLA01 as an extension of Oddfellows, or on BLA05 because of its proximity to the primary school.
HOU1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP266	Object	The Policy should be more flexible, s that more homes can be delivered in Small Growth Villages if sustainable sites are available. The policy should be amended to make it clear that the figures in Policy HOU 1 are not maxima, but minima. Policy HOU 1 makes provision for the delivery of 400 new homes in the Small Growth Villages; these will be allocated in the Local Plan Part 2. However, this figure should not be taken as a maximum. The NPPF aims to significantly boost the supply of housing. While the Plan seeks to make provision for the current housing requirement, this figure could increase, and the Plan should be sufficiently flexible to adapt to any increases in housing requirement in the near future. Paragraph 2.13 of the Background Paper 1 – Approach to Setting the Draft Housing Target – notes that ‘the housing target likely to be included in the final Local Plan might change’ and that before the Plan is due to be examined, the 2018 based ONS household projections will have been published, which could result in a change to the housing target in in the Plan. As set out in paragraph 7.18 of Background Paper 2 (Distribution of Growth), Roughton has key services including a primary school and a GP surgery, a wide range of secondary services including Post Office, public house and meeting place, and a number of desirable services including a petrol filling station and a place of worship. Roughton also lies only 3.2 miles south of Roughton Road railway station, which provides train services to Norwich. Bus stops in Roughton on the A140 provide easy access by bus to Cromer, which is located 3.7 miles to the north. North Walsham is only 6.5 miles away, and Norwich 19.6 miles. The housing target for villages which offer shops and services to their own residents and to those in smaller villages in their catchment areas should not be restricted to a total of 400 units, if further units can provide sustainable development, and can contribute to the continued vitality and viability of those villages.
HOU1	Taylor, Ms Siri (1216252)	LP188	Object	I question the need for the amount of housing proposed for Cromer, is this based on central government population growth projections? how does this tally with our actual local figures? Based on the overall number of houses proposed for the town (590 dwellings) how will Cromer's infrastructure cope with this huge increase in traffic and population. The doctors surgery is already under pressure, the roads cannot cope - especially during the summer gridlock. Cromer is the only large town development which has no bypass - nor, because of the geographical layout, is there any viable means of building one. What jobs can we offer these new residents? There are not enough affordable low cost or rental units in the proposed plans, I wonder whether the alternatives have been adequately investigated. Particularly the development of housing within existing structures e.g.: flats above town centre shops and in empty or redundant buildings, freeing up holiday homes by increasing their council taxes and developing more council controlled housing. As a town which relies heavily on tourism based on our landscape and coastal aspect - as well as our traditional, unhurried and uncrowded atmosphere, I suggest the plans should seriously take this into account. As a council which recognises the declared climate emergency this is the time for innovative thinking, surely it would be sensible to investigate alternative solutions to local housing needs.... or we seriously risk "killing the goose which lays the golden egg". Recalculate proposed number of houses. Investigate alternative housing in existing buildings - creative thinking! NNDC should strive to protect our tourism offer by limiting excessive new development, and aim to support the recognised Climate Change Emergency by protecting our important existing green amenity spaces.
HOU1	Mr Daniels (1217050)	LP257	Object	The plan needs to fully assess address the pressures arising from Norwich on the North Norfolk District housing market and seek to address this. The plan is too focused on North Norfolk District and does not fully consider external influences

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Evidence of how the original figure of 8000 new homes was arrived at should be included. In the interests of transparency the strategic housing market assessment should be appended to show how the council has arrived at this figure. Should the uptake of sites not be fully realised but at least 8000 (your figure) be built thereby meeting the Government’s target would the council review the target and determine at that time whether it is appropriate to continue to the figure of 11000, whether the uplift is still appropriate or needed, or re assess the figure and lower it in order to avoid over development? Is there provision in the plan / policy to do so or is the county locked into building 11000 houses regardless of changes in demographic or demand? HOU1a and HOU1b are definitely inappropriate. Any policy should be capable of review during its life and not have a target simply set for 20 years
HOU1	Johnson, Mr Jamie (1216384)	LP345	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is commendable that the local plan is considering in paragraph 9.7 small developments of 2 to 3 dwellings on greenfield sites to address the need for growth, future viability and vitality of rural communities where conditions for permanent residence restrictions would be applied.
HOU1	Stubbs, Mr Nick (1217346)	LP335	Object	We already have a high proportion of holiday homes, indeed one of the few areas for development (The Parishes) has recently been completed, with every property sitting empty for much of the time - I understand they are all second homes. There is even a house in Beck Close which has been left boarded up which surely could be utilised. Location specific evidence needs to be gathered to confirm what are the actual needs of any town/village in the region, rather than a top-down diktat to build, simply providing profits for developers
HOU1	Johnson, Mr Jamie (1216384)	LP347	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 9.8 I would imagine it would be prohibitively difficult to police a second homes occupancy restriction and I would therefore instead be in favour of the approach described in 9.7 where greenfield infill sites within existing settlements or predominantly built up areas of designated countryside are permitted for 2 to 3 dwellings development subject to a permanent residence restriction and respect and cohesion with the prevailing local character. . This would be in line with NPPF paragraph 78: 'planning policies should identify opportunities for villages to grow and thrive'. NPPF paragraph 68. 'to promote a good mix of sites, LPA's should support development of windfall sites through policy and decisions giving great weight to the benefits of using sustainable sites within existing settlements'. NPPF paragraph NPPF paragraph 118 on 'Making effective use of land' paragraph which state that planning policies and decisions should “promote and support the development of under-utilised land” and “support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land” .
HOU1	Kelly, Mr Sean (1216516)	LP198	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: What evidence do you have of any "identified" need for this scale of development in Mundesley? You have arbitrarily allocated this number to Mundesley in order to meet the government target for the number of houses to be built in North Norfolk. You have then, simply to reduce the work load arising from the development of a new Local Plan identified an area of land of sufficient size to deliver the allocation in a single parcel. There is a ready supply of properties of all types for sale in Mundesley particularly at the starter home end of the market which would be attractive to local residents. There is no requirement for anywhere near this number of additional homes in Mundesley and, as evidenced by the recent development on the north side of this site it is highly likely that proposals will be to build as many expensive high end homes as possible. The scale of the development is not appropriate for the site as because of the topography of the and it will completely dominate the surrounding area. Any development of the southern area of plot 1 in particular will be several feet above the level of surrounding properties in Church Road, Church Lane and the north end of Manor Road. Any development in this area will completely obscure the horizon for all properties in that area. Because of the elevated position of the site any large scale development will be visible for miles around. The site is surrounded on three sides by the conservation areas of Mundesley a development on this scale, especially at the southern end of the plot will impact negatively on those conservation areas by completely altering the character of the immediate surrounding area from open

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				farmland to dense urban development. There will be no point in having a conservation area. There are no employment sites nearby so a development on this scale will result in a significant increase in commuter traffic as. This is also true for travel to secondary and tertiary education as well as healthcare facilities and all retail activity except for immediate local store type shopping. Replace the large scale development in the proposed plan with a significantly smaller development on this site and identify other smaller scale sites in the surrounding area. Restrict development on this site to the north west of the site so it will not dominate the existing homes that surround the current proposal and will be less prominent in the landscape. Any public open space should be formed in the area adjacent to Church Road and Lane to reduce the overbearing nature of the current proposal on the surrounding properties.
HOU1	Needham, Mr Colin (1216785)	LP269	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I found the consultation documentation wordy, fragmented and hard to read so I may not have fully understood the basis for the calculations. My understanding is that there is a genuine social need for housing for residents to live in. I do not believe there is a social or economic need for allocated land for partially occupied second homes or homes to let for holidays. A community thrives when there are sufficient full time residents of all ages and aptitudes to make it work. Kids for schools, passengers for the buses, businesses for employment, support for neighbours, volunteers for community groups and indeed, congregations for churches and chapels. Allocating land in rural villages for developments suitable for sale for second homes and holiday letting will inevitably have an adverse effect on rural communities. The consultation document does not highlight or consider in detail this this adverse impact or offer remedies. The housing allocation should be calculated on the basis of need for those who wish to live (as full time residents) in the communities designated for growth. The construction of new houses on allocated sites and the conversion of existing houses for second homes should be positively discouraged. Within the limitations of planning policy this could be achieved by prescribing certain house types ,controlling housing density and the proportion of affordable and social housing in new developments.
HOU1	Noble, Dr Michael (1210275)	LP123	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In Stalham a total of 150 new dwellings are planned. The Health Authority's view that that this will not impact on local medical services is over-optimistic. All GP services are under increasing pressure even without increasing the local population. This will also be true for local schools. The current proposals will therefore diminish services for existing residents and not provide the promised local employment opportunities. The use of greenfield sites is contrary to the historical aims of planning policy in this country and just adds to the environmental disaster we are leaving to the next generation. Surely a better use for these plots would be to provide green spaces such as parks with wooded areas for local families to enjoy. There are many good examples around the country which add quality to the health and wellbeing of the community and which would add to our environmental credentials by locking-up carbon rather than releasing more into the atmosphere. Please consult with local service providers such as surgeries and schools to gain a realistic view of the impact of further increasing the local population. Please consider how this land can be better utilised to add to services for existing residents, such as local employment opportunities and green spaces for the benefit of the whole community.
HOU1	pettit, miss claire (1215847)	LP333	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In 12/1 where it puts that Cromer has been chosen for large growth, and the 600 extra homes, 12/2 it contradicts this fact by mentioning the significant landscape constraints which limit the potential for growth. The extra pressure that this development would cause on the special character of Cromer re traffic in our already snarled up central one way system, parking, health services , etc., would be detrimental to locals and holidaymakers alike. To lessen the scale and number of proposed houses required ,thus removing the need for an extra school.
HOU1	Price, Ms Amanda (1210607)	LP070	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: more restriction on second home and part time occupancy - it is unwise not to restrict some portion of the new housing to full time occupancy, and to owner occupation. In Wells local

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				people are saying that even a 28% allocation at a 20% reduction in costs (I am sure new home builds will want to sell for as high as they can as many houses as possible) will still price local people out of the market, AND lead to even more houses standing empty for most of the year with only occasional lets. This is counterproductive for the local economy, So I would like NNDC t reconsider this policy. And also for those houses which are sold without such a restriction, there should be a higher Council tax and some tracking / monitoring of occupancy.
HOU1	Rayner, Mr Andrew (1217466)	LP635	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Type of development:- who is the housing aimed at? I fully understand the need for social housing and affordable (the definition of which means it is still usually expensive.). if its for second homes etc. then it is not acceptable.
HOU1	Rose, Mr Alan (1217227)	LP577 LP821	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support house building - we all need somewhere to live. But what is planned is like adding a whole new town that's bigger than Stalham to North Walsham and I am worried that it is going to be done with hardly anyone having their say. When I attended a recent meeting in North Walsham to discuss the new Local Plan - there was just 32 people there. I spoke to a number of prominent businesses around the town and none of them were even aware that the Plan is being drawn up. Where were the voices of young people from the schools and the college who will inherit this town and have to live with the decisions being made that they have had no idea of or say in? The Town and District Councils should be engaging with these young people through the schools and college if this is to be an inclusive plan.
HOU1	Wells, MS Judith (1217777)	LP665	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is necessary to create additional housing in Wells next the Sea. The lack of affordable accommodation for the native community is already well-attested. My concern is that enforceable measures be taken to ensure that these proposed new properties do not become additional second/holiday homes, reducing the potential housing stock for local people. What will be done to ensure this?
HOU1	Mr Phillip Duncan (1217309)	LP413	Object	Housing - Second home Ownership The Council confirms in para. 9.4 that new dwellings could be legally conditioned to ensure they could only be used as main residences, but that (in para 9.8) it is currently not minded to and will reconsider this following consultation. There is much written about the need for affordable homes and the pressure which second home ownership is causing on the potential to house local people. It is recognised in the Draft LP (e.g. para 9.25) that the District has a “low wage economy and in much of the area house prices are high”. The Draft LP recognises (para 9.27) the high level of need for affordable housing. If a high percentage of the homes which are planned for are taken up by second home owners, this adds further to the housing need and therefore risks inaccuracies and underestimation in the overall assessment of need. This would therefore support the use of legal conditions to limit second home ownership.
HOU1	Mr Phillip Duncan (1217309)	LP415	Object	Housing – Policy HOU1 The total growth proposed in Policy HOU1 for Cromer is very small in comparison to that proposed for the other Large Growth Towns. It is so low that it is more like the growth level proposed for Holt, a Small Growth Town. However, Cromer is (as noted in paragraph 12.1), the District’s main administrative centre; a popular tourist destination; centrally located in the District on the principal road network and railway line to Norwich; and hosts the District hospital. As such, the town should have a greater allocation of housing than is proposed in order to ensure its vitality. Furthermore, Cromer has the second largest retail provision in the District (para. 12.5) and is a “net importer of employees” (para 12.4). There is therefore, a clear need for greater housing in the town in order to reduce commuting. The town road network is widely accepted as suffering from bottlenecks and consequent rat-running. Norfolk County Council as Highway Authority has confirmed to us that there would be significant benefit in a new link road to the south of the town, between Norwich Road and Felbrigg Road, with a first phase joining the A140 Norwich Road with Roughton Road. The NCC Officer responsible for infrastructure has confirmed that the Authority is supportive of South Cromer development which would deliver a developer funded link road and other essential infrastructure such as a school, in a co-ordinated and planned manner. We therefore consider that the proposed housing targets in HOU1 should be revised so that Cromer receives a higher level of growth which is

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				appropriate to its functional importance and to deal with unresolved commuting, transportation and infrastructure issues. See attached Paper: why Cromer should have more development than is proposed
HOU1	Bluss, Mr Andrew (1210045)	LP027	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Concerns the countryside is under threat from development. Appreciate that councils/authorities have been set housing targets. My main concerns are:- 1) Who are they for 2) Where they are sited 3) What potential impact will it have. From what I know, it is proposed that upwards of 1500 homes are planned for the west of North Walsham. Recognised there is a national housing shortage but how will the building of these properties benefit the town? These homes are being planned for the expansion of the “silver haired” generation who will (According to NNDC) be migrating from outside the county over the next 17 years. All NNDC seem to care about is the number of houses they are required to build with little or no consideration of the full impact! What will this new population want with the proposed single primary school?
HOU1	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP658	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 77 of NPPF states: ‘In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.’ Paragraph 78 of NPPF states that: ‘To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.’ The Plan identifies Large Growth Villages as settlements which are local service centres, and which support rural sustainability. Blakeney is designated a Large Growth Village. However, the Plan only designates one site for development in Blakeney for 30 dwellings. This seems very limited in terms of allocating housing growth to Blakeney, in light of the Plan’s recognition of the sustainability of the village. Blakeney have a range of shops and services and thriving community facilities, it has a primary school, and a regular bus service along the coast. The Plan should allocate more development in Blakeney, in recognition of its role as a Large Growth Village. The plan should allocate more development here, in recognition of its role as Large Growth Village.
HOU1	Brooks, Mr David (1217039)	LP253	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is a very high percentage of second homes in Blakeney, Salthouse, Cley and Weybourne. Although this may be beneficial to property owners and for trade during holiday periods this can have the effect of destroying local neighbourhoods. Impact on affordability for younger people who want to start on the property ladder as a high number of new properties are priced and aimed at 'second home' owners. Other areas of the country such as St Ives and in Northumberland are taking action to restrict sales of properties to second home owners and details were provided to David Young and Sarah Butikofer in May 2015. Is the Local Plan considering this aspect?
HOU1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The 2018 Government Housing Delivery Test identified that North Norfolk have delivered 126% of homes required over the three-year period ending 2017-18 which is positive. Anticipated current Core Strategy target of 400 dpa will increase to 553 dpa. However, The housing requirement should be a minimum figure not a range limited to a maximum of 11,000 and arguably higher to provide the flexibility to deliver sufficient housing in accordance with recognised need throughout the plan period. Support the identification of 592 dwellings on sites in Cromer. However, to provide sufficient flexibility to deliver housing over the plan period – and for the avoidance of doubt, the wording should be amended to confirm that homes can come forward on allocated sites on the edge of the existing settlement boundaries of the Large Growth Town (within which Cromer falls) Releasing edge of settlement land for development in the instance Site C16 is both sound and justified, having regard to national policy and the supporting evidence base. Nevertheless, it should be made clear that the 592 figure and 909 figure for the total growth (2016-2026) for Cromer is a minimum. Specifying a minimum requirement of 909 is a pragmatic and sound approach which will allow the plan to adapt to meet housing need over the plan period.

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HOU1	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Building 11,000 houses, each with high carbon construction costs, and the associated infrastructure, will hugely increase carbon emissions. Dangerous policy, completely contradicting current knowledge, policies and priorities. New work and widespread consultation should be undertaken to produce a local plan fit for current circumstances.
HOU1	Ringer, Mr Callum (1218561)	LP772	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The council should priorities homes for local people, and make efforts to keep them affordable. Impose bans on second homes, as has happened in the south west. If possible, this should be included.
HOU1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Plan is generally sound having regards to the tests set out in NPPF. Plan prepared positively, it sets out a mechanism to meet North Norfolk's OAN. Housing numbers as a minimum number to be delivered in the plan period is an appropriate method of boosting housing supply and delivery
HOU1	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Proposed 10,000 or so houses is far too wasteful of scarce land
HOU1	Philcox, Miss Charlotte (1210047)	LP026	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I know orders are coming from national government, but I'm concerned that the building of such a large number of new properties in a relatively small market town isn't sustainable in these times of climate change, real poverty, and environmental debilitation. The town doesn't have the infrastructure to support such a large development (e.g. doctors' surgeries and other medical/home care provision, are both already oversubscribed).
HOU1	Rayner, Mr Andrew (1217466)	LP635	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Increase in population: Such development will require new roads, access to the town centre and its shops. Existing Roads can just about cope, how will traffic be managed? 1800 homes equates to at least 1800 vehicles. Parking in town is already difficult and will the extra traffic will lead to pollution and congestion. as some of the site is to be earmarked for commercial use there will also be a likely increase in commercial/service vehicles as well.
HOU1	North Norfolk District Council Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	The level of development which is proposed for North Walsham would impose a considerable strain upon our town. We share the concerns of the Town Council that the scale of growth suggested for North Walsham is unprecedented. If such growth is to occur then we must have timely and appropriate investment in our infrastructure. The Western Extension Link road must join the North Walsham Industrial estate to the Norwich Road and that this road should be built before the construction of housing begins. Declared a climate emergency has significant implication for North Walsham as it is a growth town. We endorse North Walsham Town Council's requirement for a robust assessment of the threat which the proposed scale of growth would pose to medical provision within our town and we agree with them about the necessity for a new primary school accessible from a western extension link road running from the Norwich Road to the District Council's Industrial Estate.
HOU1	Willer, Mr Kevin (1210031)	LP022	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Opposing so many new dwellings in North Walsham, particularly on the western side of town. This kind of proposal is over development on a massive scale using many green belt areas. I understand the need for some housing but 2000 plus for North Walsham would be a disaster. The current infrastructure into and around the town is totally inadequate and busy at the best of times. Another 5000 people in the town meaning probably 2000 plus cars will cause chaos. In particular roads such as the Grammar school road and the old roads

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				<p>through town, which already suffer with heavy traffic, would not cope with more. The new link Road proposed may well stop some lorries coming into the town and allow people access to new estates but will go no way into solving the traffic problems around the rest of the town, more cars will only add to it. The effect on the environment also concerns me. Living on the Skeyton Road and enjoying views of the countryside we are privileged to see a whole manor of wildlife extending from our garden over to Weavers Way. We see deer, bats, hedgehogs, pheasants nesting, skylarks nesting in the field, owls plus many other species. Nobody ever seems to give a dam about the wildlife in a time when we really should be caring about them and our environment. More cars causing congestion means more pollution. Our children walking to and from school already suffer enough pollution. The council do not consider the lives of all those, like us, who are directly effected by the proposals. Having houses being built behind us and next to us will destroy our current lifestyle destroying views of outstanding beauty and destroying a peaceful life, which is why we moved to our house in the first place. Our properties will no doubt loose value, our ability to sell as of now is limited due to the uncertainty of what will be happening in the fields around us. Effectively our lives are on hold awaiting noise and disruption. Do we qualify for compensation? As it stands no doubt the landowners of the fields identified as new dwelling sites are set to become very rich whilst current residents suffer. People enjoy the peace of Weavers Way, effectively North Walsham's piece of peaceful countryside, but now this is to be ruined by being surrounded by houses and a road going right through it. The services in this town are already stretched to the maximum. There is a mention of a new primary school but what of the impact on the high school and college? The Doctors surgery is constantly busy, it takes weeks to get an appointment, having attended the drop in session at the community centre today I heard the planner say that's a problem for the NHS there should be more doctors at the surgery. Great attitude and a typical one that suggests the desperate need to adhere to pressure and get building. In my opinion if the government can't sort important problems such as health care to meet communities needs then they should not be forcing councils meet such high housing targets! The planner also mentioned that the highways agency have provided evidence that North Walsham does not suffer traffic issues. This I cannot believe as I have lived in the town and regularly get caught in traffic. Surely there is a point when a town can become to big for it's own good? The only ones to benefit are the landowners, developers and council. Cannot see any benefits for current residents by over building like this. Object to preferred site in North Walsham.</p>
HOU1	Willer, Mrs Jill (1210911)	LP099	Object	<p>I have seen many changes and developments in and around the town. I truly believe that the town has almost reached it's capacity and any new builds should be limited to brown field sites. The number of new builds suggested needs to be scaled down. 2000 plus is unrealistic. We have just had new house builds on the Norwich Road, putting an extra strain on our doctors surgeries, dentists, drainage, water supply and the national grid. How would they cope with the population of another 2000 dwellings? The NHS dentists in the town are no longer taking on new clients, we cannot obtain new doctors due to the work overload and stress of it all! A population increase means more cars commuting to schools. There is suggestion of a new primary school but what of the strain on the high school and college? The town network cannot cope with all the extra traffic. To suggest an increase to the industrial estate with extra units as a solution to the lack of jobs in the town is ridiculous. The days of high employment in the town are long gone with the major employers of the 1970's and 1980's. We will have more houses than ever but less jobs than past times. One of the reasons for Crane Fruehauf closure was because of the poor road network to North Walsham and this has not improved since the closure, 20 years ago. Why not build between Norwich City limits and the NDR first. People need work and the vast majority of jobs are in Norwich. People already commuting between North Walsham and Norwich do not have a good road network (B road). It is immensely busy. More cars would put a strain on this. What about the nature habitat. There are 17 species of bees regionally extinct, 25 types threatened and 31 conservation concern. We will not be able to survive in the future without them and nature. This proposal would see North Walsham expanding out of control over beautiful countryside. With the running out of oil for artificial fertilizers, our future generation</p>

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				will need the land to go back to organic growing in order to feed the population, instead of intense farming. They will need the green belt land that this proposed plan will take. Why should people who have already made their homes in North Walsham, especially on the west side, have to put up with all this disturbance and destruction over many years.
HOU1	Philcox, Miss Charlotte (1210047)	LP026	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: If it is to occur, such a large influx of homes for North Walsham must surely be targeted to those in need, not be simply yet another large estate of flashy, 'executive' style homes which are dependent on car use.
HOU1	Bluss, Mr Andrew (1210045)	LP027	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Cannot see a dentist at my chosen surgery because they have vacancies they cannot fill. Professionals cannot, it seems, be attracted to North Walsham despite the growing number of residents (now and in the future). Planned demographics of the residents due to live in this accommodation, what happens when the need for elderly care is required for those unable to live at home anymore? There is only one nursing home within North Walsham (Halvergate House) with limited availability within the remaining care homes. There is going to be a significant number of people who are going to need specialised care in their later years, putting an extra strain on an already overburdened healthcare system. This is a national problem but little or no provision has been made to account for this.
HOU1	Howe, Mrs Alex (1217494)	LP645	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are 22 new houses currently being constructed in the Churchfield development and planning permission exists for a further 28 in the Tilia estate. These houses should be included within the required allocation of 150, reducing the new build requirement to 100. 6. Increasing number of second homes is creating an unsustainable need for new housing stock. Regulation and financial policies should be introduced to limit the growth of second homes, thus reducing the demand for new homes. 4. Ensure that the Church Field and Tilia developments are included in the 150 dwellings sought for Hoveton.
HOU1	Hull, Mrs Alicia (1210435)	LP763	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The pattern of out-of-town car dependent housing schemes, aimed largely for the wealthy and holiday houses and second home owners, with only a few so called 'affordable houses', has been destructive. It has added to pollution and congestion, got rid of green field sites, undermined village communities and made many locals homeless. Change to supporting rental accommodation at reasonable costs, built to minimum construction costs and minimum use of carbon for heating and cooking, and with all costs offset, so there is no overall carbon gain. Use widespread consultation and expert information to help devise the policy.
HOU1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP254	Object	Paragraph 77 of the NPPF states that: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.' Paragraph 78 of the NPPF states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.' Policy SD3 does make limited provision for new development in Small Growth Villages. The policy states that: 'Small scale developments, including brownfield developments, community facilities and services will be permitted within the defined boundaries of the following Small Growth Villages.' Footnote 11 of the Plan notes that small scale developments are defined as infill development and new allocations of between 0-20 dwellings (to be selected in a Part 2 Plan). The policy goes on to note that: 'Outside defined development boundaries in areas designated as Countryside, residential development will only be permitted where it accords with other policies in this Plan. Or: 1. The proposal is for small scale development of typically no more than 5 dwellings; and 2. The site comprises of previously developed land; and 3. Development of the site would result in infilling or rounding off in a predominantly built up area.' We strongly suggest that this policy is overly restrictive and does not comply with paragraph 16b of the NPPF, which requires that plans should be prepared positively, in a way that is aspirational but deliverable. It is respectfully submitted that, as

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				<p>drafted, the Plan does not go far enough in enabling villages in North Norfolk to grow and thrive. It is well documented that shops and services have closed in many villages in recent years; this Plan should provide an opportunity to reverse that decline and should not artificially restrict housing to infill or densification in Small Growth Villages which do still have a range of facilities and provide a relatively sustainable location for future growth. Instead, it should provide the opportunity for Small Growth Villages to grow and attract new residents. It should provide a more flexible policy context in which development can be brought forward. Specifically, the existing provisions of the Plan should be replaced by a policy which states that developments of 0-20 dwellings should be permitted on land adjacent to settlement boundaries, or sites which are close to settlement boundaries, and are in sustainable locations.</p> <p>We have reviewed the 23 Small Growth Villages identified in the Plan, and believe that generally sites of twenty properties cannot be accommodated in these villages, where the settlement boundaries are drawn tightly, there is little land availability and there has already been infilling and densification of the existing built form. It is therefore likely that, in order to provide approximately 20 dwellings within the settlement boundaries of each of these villages as required by Policy HOU1, several, smaller sites could be required. Development of several, smaller sites is likely to have a greater impact in terms of impact on amenity on the existing residents and is unlikely to deliver any scale of infrastructure which could make a meaningful contribution to offset the impacts of development. Indeed, it is likely that many of the smaller sites will avoid providing any affordable housing, if they fall below the thresholds for affordable housing provision proposed by the Council in Policy HOU2. We suggest that the Policy should be amended to make provision to allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings. This would help to conserve the existing urban fabric of the villages, and would allow some controlled, sustainable expansion of the Small Growth Villages, which, as identified in paragraph 7.24 of the draft Local Plan, have a number of services, and act as limited service hubs for other nearby villages, thereby complying with the provisions of paragraph 78 of the NPPF. On this basis, my client's sites should be considered for allocation in Roughton. Land north of Chapel Road lies to the west of the existing settlement boundary, in an infill plot between the existing properties along Chapel Road. The Plan affords the opportunity to review the existing settlement and include these properties and my client's infill site within the boundary. The site lies in a highly sustainable location, only some 600m from the village centre and is connected by an existing pavement, enabling residents to walk into the village. Land east of Norwich Road lies adjacent to the settlement boundary, which is formed by the A140, and also lies within walking distance of Roughton's shops and services, and bus stops on the A140. We suggest that the Policy should be amended to make provision to allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings.</p>
HOU1	Johnson, Mr & Mrs (1215700)	LP139	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. It is pointless building homes on the coast to serve the local community if they are all snapped up by second home owners. That does not address the needs of the local community. That will just lead to continued demand for more housing. Second home ownership pushes up costs and demand for affordable housing. Second home ownership should be discouraged by charging full council tax, business rates where appropriate and by local occupancy clauses in developments. The acquisition of development sites by individuals for the purpose of second homes should be positively discouraged. There are many examples of homes of this nature on the coast built with inappropriate materials, out of character detailing and inappropriate size. Also too many overdeveloped sites are changing the character of the villages.</p>
HOU1	Griffiths, Mrs Heather (1210796)	LP087	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Concerns about any significant development of new housing in Wells, due to the additional pressure on local infrastructure - particularly parking and the roads. We already have plans in place to restrict parking which means that people cannot park outside their houses. I suggest that we consider 'residents only'</p>

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				parking. I also question whether Wells has the amenities to support much more development. However, I do understand the need for limited development, and affordable housing in particular (which I believe should be restricted to local people only). Assuming that any approved development is sensitive to the local environment and contains all the basic infrastructure, I support the development at sites W07/1 and W01/1 as these would have the least impact on residents of the town and visitors.
HOU1	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Stop the loss of housing stock to second, and holiday letting, homes across the District by introducing local primary residential conditions.

Individuals	Number Received	Summary of Responses (Policy HOU1)
Summary of objections	32	Many commented that the overall housing target was too large and the governments standard methodology was not easily understood or appropriate. Many respondents focused on proposed growth levels in their own towns citing growth was not appropriate for a variety of reasons from lack of infrastructure and service provision , road network, countryside locations and impact on existing views, agricultural production and inadequate employment opportunities as well as affordability issues and the potential to be used as second homes. Some however objected due to the allocations not being large enough commenting that the target was not sufficient and more development should be allocated in the smaller service villages such as Blakeney, and that the small scale target for infill development of 400 was not sufficient . Scale of development in North Waltham, Cromer, Hoveton , Wells and South Repps were mentioned specifically as not appropriate, but for a variety of local issues. There was a strong sense that the local plan should only be seeking to meet the housing need locally generated and that the target is objected to because it does not seek to prioritise local occupation. Others however thought that restricting occupation was not enforceable and would not result in any net benefit or affordability and at least eased the burden of growth on the health service and surrounding services.
Summary of Supports	4	Support was expressed where appropriate housing types and where the target could be reviewed or revised in light of more up today household projections . Greater transparency was called for in the over all figure. Support for growth in Beeston Regis to accommodate over flow from Sheringham.
Summary of General Comments	16	General comments also focused on the high housing target and the potential impacts on services and perceived infrastructure limitations as well as percept impact on house prices due to the competing demands of second home owners. Other however supported the need for the target to be used as minimum to provide the appropriate type of housing to meet all needs. some comments focussed specifically resources while others made general comments around the suitability of North Walsham to accommodate such a high level of growth.
Overall Summary		Majority of respondents raised concerns that the housing target is too high and that the District cannot accommodate the proposed level of development due to constraints, lack of infrastructure capacity , road network, service provision etc. and the need to only address locally derived need . However a number of representations argued that the housing target should be considered as a minimum or arguably higher to provide the flexibility to deliver sufficient housing for the recognised need throughout the plan period. There is widespread views that the number of second homes has an adverse impact on the local housing market and in particular prices out local people and limits the type and tenure of properties that are available for local occupation and being built. A number wished to see the introduction of occupancy restrictions, but some acknowledge the difficulty in enforcing them and that they may not improve affordability.
Council's Response		Noted: Consider comments in the finalisation of the policy. The Local Plan seeks to address the Strategic needs of the District which are calculated using a standard methodology set out in national guidance. Local Plans should set out policies in order to address all needs , market, affordable, economic and social in line with national policy. Targets are set out as minimums. Plan making remains iterative and the target will be reviewed in line with evidence and the

methodology in future iterations. Full details are published in background paper 1: The approach to setting the Draft Housing target. • Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts and provide flexibility • The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and be prepared with the objective of contributing to the achievement of sustainable development in a positive way that is aspirational but deliverable. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. • The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need.

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Policy HOU2 - Housing Mix

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU2	Addison Elaine (1210267)	LPO75	Object	I would urge NNDC to place a 45% obligation for affordable and social housing within this enormous development, along with a legally enforceable lock-in from the developers to deliver on this requirement.
HOU2	Carr, Mrs Elizabeth (1216730)	LP438	General Comments	There is a waiting list of about 3000 people on the housing list in the area I live. Although 'affordable' housing has been built recently some of the properties are still empty because they are not actually that 'affordable'. -More prominence and an active encouragement for self builds. People building their own homes are more likely to want to live in them and live in an area they like
HOU2	Woodward, Mrs Josephine (1217427)	LP594	General Comments	Consideration needed for the types of houses for the retired, elderly and those with dementia. Needs to be a clear strategy for the delivery of low cost homes for the young and for those who will need to provide the care for themselves and others.
HOU2	Edwards, Mr John (1216139)	LP317, LP322	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Policies HOU 2 and HOU 3 are not sufficiently sensitive to the special needs of Wells; more closely aligned with Blakeney and other coastal villages along the North Norfolk Coast. The attraction of this location, together with the nature of employment in Wells, means that there is not enough affordable housing, particularly affordable housing for rent. Local analysis suggest that the current demand for rented housing in Wells is higher than the total housing proposed through the Local Plan. Policy HOU 2 would only require 28 affordable dwellings to be built and this is entirely inadequate. As the target for 80 dwellings is not being challenged in this submission, the housing policies for Wells need further refinement; they need to be more aligned with HOU 3, or there needs to be a separate policy reflecting recognition of the special circumstances in Wells [and any other settlement similarly affected] if a market force outcome is to be avoided, and the demand for local need met.
HOU2	Swift, Mrs Julie (1216911)	LP244	Object	Affordable homes now seems to relate to "Housing Association" homes only. There are a lot of young people in the area who are in work and do not qualify for (or want) a Housing Association home, but who want to buy a property themselves. As most smaller/cheaper homes are snapped up as holiday lets or second homes there are no properties that they can afford. Prices are artificially raised on properties they might be able to afford as they can be sold for holiday use. The Council must start imposing full time residency occupancy restrictions on cheaper properties to allow them to be purchased by local youngsters or elderly people whose incomes have reduced. They can do this as it states in section 9.4 (under Housing Policies).
HOU2	Smith, Mr Mark (1209582)	LP042	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Seems to be a positive approach to affordable housing although a larger percentage of low cost home ownership could be beneficial in the long run as home ownership promotes more benefits for the occupiers and greater prosperity in the future for younger residents. Such help from the council may include low cost loans to assist with deposits. Maybe schemes such as Suffolk council undertook where low cost home ownership was available with no deposit and properties bought required completion of bathrooms, kitchens and decorations so to reduce the selling price initially. The mortgage was supplied by the council due to properties without working kitchens and bathrooms not being mortgageable. There was a time frame that the required work had to be completed by but basics would have been acceptable.
HOU2	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP267	Object	The policy identifies two affordable housing zones in the District; Roughton lies within Affordable Housing Zone 1, where the proposed provision is at least 15% affordable homes on schemes of 6-25 units. These zones relate to viability, and do not correlate with the boundary of the AONB. Paragraph 63 of the NPPF states that: 'Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas.' The Norfolk Coast AONB covers part, but not all of the District. As drafted, Policy HOU 2 requires provision of affordable housing on sites of 6-25

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				dwellings across the District, not just in the AONB. This approach does not therefore comply with NPPF paragraph 63. Policy HOU 2 should be amended to only require contributions to or provision of affordable housing on schemes of 6 or more dwellings for sites in the AONB: outside the AONB, the threshold should be 10 or more units, following the definition of major development set out in the NPPF glossary.
HOU2	Terrington, Mr Peter (1215743)	LP125	Object	High demand for second homes, retirement homes and properties for holiday letting; the risk is that most new development homes will be acquired for these purposes, being beyond the means of the working population. I am very pleased that the Council has recognised this risk and has attempted to keep the new build allocation, for Wells, to a sustainable level, particularly if the affordable homes target of 35% can be achieved! The viability of this target of course will depend on the sale price of the land. You will recall that with the Hopkins Homes development, at Market Lane, although the developer adhered to the 40% affordable homes allocation, it was necessary to reduce the building code requirements to make the development viable. Due to the chronic shortage of affordable housing, in Wells, for local people, as highlighted in the most recent "Homes for Wells" Housing Needs survey, it is essential to specifically include an Exception Site, in the Local Plan for Wells. I would urge that the strip of land WO1/1 should remain outside the development boundary, for Wells, and that the site is developed as an exception site
HOU2	Hull, Mrs Alicia (1210435)	LP073	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Any housebuilding in future should be for rent at reasonable rates to provide homes for local people – a return to council housing.
HOU2	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. In some areas provision of houses of a certain type / size will encourage second home owners. These types of property should have local occupancy rules to prevent lack of this type for local people.
HOU2	Rose, Mr Alan (1217227)	LP580 LP821	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whenever groups of houses are built, consideration needs to be given for a mixed community of social housing. There also should be adaptations made to include those with physical/mental disabilities, not necessarily living together in the same place but being included within the community. The Council could work with charitable organisations to possibly share the costs for the build. Other living considerations should also be taken into account such as fostering with families whose own children have flown the nest and could have rents adjusted for the work they are doing with young children in care. Looking at older people the same thing can be done for them - being included in family situations but who are currently overlooked by the Local Authority. Provide: 1. Social housing 2. First time buyer/affordable housing 3. Supported living in small community plots mixing young and old 4. Design community living into the plans We could take a close look at what's been done in places like Holland where plans are made in a joined up way, thinking about long term health and care needs. But if we don't have our say there's a risk that developers will just squeeze in as many houses as they can as cheaply as possible.
HOU2	Mr Phillip Duncan (1217309)	LP417	Object	Housing - Affordable – proposed Policy HOU2 The Affordable Housing Zones 1 and 2 as identified in the Draft LP (page 122) are inconsistent with the Zones shown in the NNDC Interim Plan Wide Viability Assessment (2018). This brings into question the reliability of the background information and translation into policy. This affects proposed Policy HOU2.
HOU2	Bates, Mr & Mrs Clive & Eileen (1215840)	LP124 LP703	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Need to make available affordable homes so young people can live in the village and bring up their families, do we need more expensive properties so a % of them just become second homes as has occurred on another large development in the village.
HOU2	Bluss, Mr Andrew (1210045)	LP027	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: A chronic demand for a greater proportion of social housing and/or affordable homes for first time buyers. Developers are only obliged to provide a small number of these type properties

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				for those people requiring them. How is that to help the residents of North Walsham who need that type of housing? Developers want to make money. There is little appetite/profit margin for the mass building of social/affordable homes.
HOU2	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: North Norfolk needs: • More affordable rented homes - at least half of the projected developments • More housing with care to enable our ageing population to continue living independently and with the support they need
HOU2	Rice, Mr Colin (1210475)	LP130	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan should be responding to the increase in self-build housing, which provides a route for individuals to build their own home at a more affordable cost than market housing. Remarkably, other than requiring a few self-build sites within the specific Town and Village Proposals, there are no policies in the plan that actively encourage or support this route to home ownership. Whether officially 'market' or 'affordable' housing, self-build is likely to be a method that is actually affordable to those undertaking it, and deserves more recognition in the plan. Although the council's register of interest in self-build may not be currently large, there is large latent interest in self-build. A survey commissioned by the Building Societies Association (BSA), published in October 2011, and quoted in the House of Commons briefing attached, suggested that 53% of people in the UK would consider building their own home given the opportunity
HOU2	Hull, Mrs Alicia (1210435)	LP763	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The pattern of out-of-town car dependent housing schemes, aimed largely for the wealthy and holiday houses and second home owners, with only a few so called 'affordable houses', has been destructive. It has added to pollution and congestion, got rid of green field sites, undermined village communities and made many locals homeless. Change to supporting rental accommodation at reasonable costs, built to minimum construction costs and minimum use of carbon for heating and cooking, and with all costs offset, so there is no overall carbon gain. Use widespread consultation and expert information to help devise the policy.
HOU2	Drury, Mrs Margaret (1210793)	LP086	General Comments	I am dismayed at the number of additional homes within the plan. As stated many of these will be taken by retirees into the district and will not be affordable for those working locally. We need many more affordable homes, including homes at affordable rents, for local working people. I would agree with imposing main residency conditions on all new developments.
HOU2	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 3.13. Housing need is likely to change throughout the plan period and will vary at a local level. The changing requirements for affordable housing, type and tenure, optional standards, self and custom build, specialist elderly and care provision and other needs should be reflected in policy wording which is flexible and not too prescriptive.3.14. Support the policy. However, housing mix should be informed by local requirements and site specific market indicators as defined in NPPF paragraph 61.3.15. By setting specific requirements at the time of writing, the policy wording proposed particularly Affordable Housing, Required Market Housing Mix and Required Affordable Housing Mix is currently too restrictive. To ensure the Local Plan can accommodate changes in housing requirements up until 2036, policy wording should instead allow for developments to address future need, identified at the time of an application. 3.16. Similarly, other than for affordable housing which is zoned, no flexibility is made within the policy to allow for variance in local needs as a result of site specific considerations.3.17. Some degree of flexibility is required to adapt to changing needs over the plan period. To ensure development brings forward the right kind of homes in the right places, policy wording should require development to deliver a mix of housing which satisfies the most up to date housing need assessment, rather than restricting development to the composition table set out in the table.3.19. A similar approach should be applied to 'specialist elderly / care provision'. Whilst the development plan should prepare for an ageing population, a set requirement for sites which can accommodate in excess of 151 units requiring a minimum 80 bed spaces and further 40 bed spaces for each additional 150 dwellings thereafter is too restrictive and inflexible to change. 3.18. As such, policy wording should read: "Unless the proposal is for a Rural Exceptions Scheme, Gypsy and Traveller accommodation, or specialist(65)residential

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				accommodation all new housing developments, including those for the conversion of existing buildings, shall provide for a mix of house sizes and tenures in mix of different housing sizes and types, informed by the most up to date needs assessment or other robust evidence, as well as the Borough wide housing mix monitoring target in the table below or any local target set by a Neighbourhood Plan, taking into account site specific considerations.” For a robust Local Plan, which can adapt to changes in need, the table in the policy should be removed, replaced with a broader policy which requires development to address specific housing need such as mix, optional standards and housing for older people according identified need at the time of an application.
HOU2	Cuthbert, Mr Andrew (1218313)	LP702	Object	~more attention should be given to making a higher percentage of new builds "AFFORDABLE" . In order that young couples can afford to buy and start their home OWNING journey at the bottom of the ladder. ~can each development in our villages only be allowed with the proviso that a percentage of the dwellings be for sale at an affordable price earmarked ONLY for LOCAL need.
HOU2	West, Dr Louisa (1210536)	LP052	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More detailed consideration needs to be considered to the needs of 'elderly' people and who is included in this description. Many men and women who have recently turned 60 will not receive their pension until 66/67 or a bus pass. Many will hopefully live possibly another 20/30 years and their requirements for homes and services may well change a few times during their remaining lifetimes. Many people 'retiring' are likely to move a few times and have different needs, after retiring. The proposals do not appear to recognise the diversity and changing needs of people of various ages.
HOU2	Drury, Mrs Margaret (1210793)	LP086	General Comments	We need many more affordable homes, including homes at affordable rents, for local working people. I would agree with imposing main residency conditions on all new developments.
HOU2	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan anticipates up to 10,000 new homes over twenty years, of which about 2,000 should be affordable. This is quite wrong. If we need 10,000 new homes then 10,000 of them should be affordable. They should be built by housing associations, local authorities or developers, all of which should be on a not-for-profit basis. We don't need any more large houses which local people cannot afford, we need houses which local people can afford, over which local people should have priority allocation, and which should be a mixture of sale, mixed rent/mortgage, and rent. They should only be available to people who live or work in the District and have done so for a specified number of years, perhaps 2, and all the houses should have irrevocable clauses in them which maintain that residence condition for a specified number of years, at least 20. (Some exceptions should be allowable, for example some houses should always be available for refugees, and for people escaping from domestic violence).
HOU2	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This policy is of great relevance to us as it will dictate the level of social, rented housing and low cost market housing available to our constituents. North Walsham is located within Affordable Housing Zone 1. This means that on any site of more than six houses our requirement for on site provision of affordable homes is a minimum of 15%. We are not convinced that this target is high enough to meet the housing need within our town. We would instead favour a target of 30%. We are concerned too that provision for Low Cost Home Ownership must reflect actual levels of income within North Norfolk rather than levels of average income for England as a whole. We would hope to see a higher target for affordable homes and careful oversight of the provision for Low Cost Home Ownership. Special concern to us as it expresses North Norfolk District's Council's requirement for affordable housing on larger sites and we have doubted whether this policy truly takes account of the level of our need for social rented housing.
HOU2	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Provide more shared equity affordable homes across the District either through schemes with Housing Associations or through a NNDC funded scheme.

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Individuals	Number Received	Summary of Responses (Policy HOU2)
Summary of Objections	10	<p>Objections comment on the shortage of affordable housing in the District and the need to build more in the new plan. A number of comments focused around the need for houses for first time buyers some preferring an increase in low cost home ownership models, rather than housing associations while other supported more rented properties. The requirement for affordable housing percentage was supported but some challenged that it was too low. Others suggested that the zonal approach was not supported by the Council's viability study and lower percentage should be required in the identified zones away from the coast. Affordable housing thresholds were also challenged in that a higher threshold in line with national policy should be applied outside the AONB. More housing with care is needed to enable the ageing population to continue living independently with the support they need. Specific issues raised about Wells-next-the-Sea, although the overall number of homes was not challenged it was thought the application 35% affordable housing would not address local need. No need for large houses and housing should be available to people who live or work in the District. The Affordable Housing Zones 1 and 2 as identified in the Draft LP (page 122) are inconsistent with the Zones shown in the NNDC Interim Plan Wide Viability Assessment(2018).</p> <p>One representations comments that the approach doesn't comply with the NPPF Para 63 and should be amended to only require contributions to or provision of affordable housing on schemes of 6 or more dwellings for sites in the AONB, outside the AONB, the threshold should be 10 or more units, following the definition of major development set out in the NPPF glossary.</p>
Summary of Supports	1	<p>Although there was limited direct support there was indirect support contained in comments for the policy approach in that it recognises the need to address affordable housing, ensure appropriate type and size of homes are sought and that the proposed policy recognises the need for elderly accommodation.</p>
Summary of General Comments Page 125	14	<p>General comments mainly focused on the preference for more affordable housing at a price and tenure that suits local need and for homes for the elderly and people with dementia that could be adaptable. Some support for self build but not tied to the settlement hierarchy. mixed opinions were given on tenure, with some favouring low cost home ownership products to get onto the housing mkt while others thought more rented / social prices should be delivered. Generally considered that the provision for Low Cost Home Ownership must reflect actual levels of income within North Norfolk rather than levels of average income for England as a whole. Others commented that the policy was too restrictive and prescriptive and not flexible enough to respond to the changing needs over the plan period</p>
Overall Summary		<p>Most comments raised concern about the shortage of affordable housing within the District and the need to encourage more, at a price and tenure that addresses local need with the provision for Low Cost Home Ownership reflecting actual levels of income within North Norfolk rather than levels of average income for England as a whole. Generally there is support for a higher affordable percentage being required. Concerns around the perceived impacts of second homes on the price of homes was a common theme. Support was also implied for more elderly accommodation and adaptable homes however there were others that said the approach was too restrictive and not reflective enough to local circumstances and challenged the evidence base on viability zones and the lowering of the affordability threshold outside the AONB.</p>
Council's Response		<p>Noted: agree, disagree (partly) - Consider comments in the development the policy. Affordable housing need is identified in the Strategic Housing Market Assessment and evidence shows a clear need for rented properties and two /three bedroomed properties which the policy advocates. The Council consider that affordable homes should be genuinely affordable reflecting the local economy and support for price controls in accordance with local income is however also welcomed. The policy is designed to deliver the identified strategic needs of the District while Other policies in the plan actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts brought about through community planning powers. Policies HOU8 & 9 focus on the requirement for minimum space standards and accessible and adaptable properties. The Council supports self building in accordance to sustainable distribution principle. The viability zones reflect the conclusions of the Plan wide viability study and market values/development costs across the district and the approach across the distribution and allocations meets the identified need for affordable housing. Affordable Housing thresholds reflect the rural area designation of north Norfolk under the s.157 Housing Act 1985.</p>

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

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU3	Witham, Mr I M (1216498)	LP203	Support	Support for this policy, but further clarification is required. It essential that the existing settlement should offer something by way of facilities, as opposed to just being an existing cluster of private dwellings. The development of sites which not meet these criteria would potentially have a harmful or undesirable effect upon the environment and quality of life of existing residents. It is essential that such sites brought forward under this policy demonstrably have the overall support of the local community. Clarification of what is meant by the "facilities" provided by an existing settlement. Provision in the policy for demonstrable community support, consisting of the support of the parish council and preferably also an approved local consultation exercise.
HOU3	Edwards, Mr John (1216139)	LP317,LP322	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Policies HOU 2 and HOU 3 are not sufficiently sensitive to the special needs of Wells; more closely aligned with Blakeney and other coastal villages along the North Norfolk Coast. The attraction of this location, together with the nature of employment in Wells, means that there is not enough affordable housing, particularly affordable housing for rent. Local analysis suggest that the current demand for rented housing in Wells is higher than the total housing proposed through the Local Plan. Policy HOU 2 would only require 28 affordable dwellings to be built and this is entirely inadequate. As the target for 80 dwellings is not being challenged in this submission, the housing policies for Wells need further refinement; they need to be more aligned with HOU 3, or there needs to be a separate policy reflecting recognition of the special circumstances in Wells [and any other settlement similarly affected] if a market force outcome is to be avoided, and the demand for local need met.
HOU3	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree Only if local occupancy and not second / holiday homes.

Individuals	Number Received	Summary of Responses (Policy HOU3)
Summary of Objections	1	Objection concerned that a bespoke rural exception policy should be set for Wells -next -the Sea.
Summary of Supports	2	conditional support for this approach- Development should be well related to settlements with facilities and are not just a cluster of private dwellings and have the support of the local community and clarification of facilities.
Summary of General Comments	0	None received.
Overall Summary		Limited number of comments received on this policy. Clarity is sought over the definition of 'facilities' and the requirement for proposals to be well related to settlements with local facilities and how housing need will be calculated.
Council's Response		Noted - No substantial issues raised, consider comments in the finalisation of the policy. Clarity over the definition of 'facilities' and how housing need should be demonstrated. Consider restricting policy to those settlements with a level of service provision. Wells is identified as a small growth town and as such the exceptions approach detailed actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need. The Council and other policies support the delivery of growth to address local needs through neighbourhood planning and through community land trusts brought about through community planning powers. As an exception to planned

development occupation is limited to those that meet the Councils local occupancy policy i.e. those that have a strong connection to the local community in perpetuity.

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Policy HOU4 - Agricultural & Other Key Worker Accommodation

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU4	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. See comment. The policy must stop these homes being subsequently sold for other purposes or for second homes.

Individuals	Number Received	Summary of Responses (Policy HOU4)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy; restrictions should be in place to restrict these houses being sold for other purposes/ second homes.
Summary of General Comments	0	None received
Overall Summary		Support this policy; restrictions should be in place to restrict these houses being sold for other purposes/ second homes.
Council's Response		Comments noted. The council will impose a restrictive occupancy condition to ensure the that any dwelling remains available to meet the needs of the particular business

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

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU5	Johnson, Mr & Mrs (1215700)	LP142	Support	Agree

Individuals	Number Received	Summary of Responses (Policy HOU5)
Summary of Objections	0	None received
Summary of Supports	1	One support for this policy.
Summary of General Comments	0	None received
Overall Summary		No substantive issues raised
Council's Response		Noted

Policy HOU6 - Replacement Dwellings, Extensions & Annexed Accommodation

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU6	West, Dr Louisa (1210536)	LP060	Object	These policy has a risk of increasing the number of properties including some holiday let/bed no breakfast, second homes and multiple occupancy. The policy must only be for full time homes and ensure the 'improved' property is revalued for council tax.

Individuals	Number Received	Summary of Responses (Policy HOU6)
Summary of Objections	1	One objection received, concern that this policy would result in an increase of second homes and suggest that occupancy restrictions should be in place.
Summary of Supports	0	None received
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised. Concern expressed that replacement dwellings and extensions and annexed accommodation would increase the number of second homes.
Council's Response		Comment noted. The approach aims to allow moderate change to properties in the rural area but also to retain a range of housing types in the countryside to ensure choice and variety. It should be noted that not all extensions require an application for planning permission due to permitted development rights laid down by national policy.

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

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU7	Witham, Mr I M (1216498)	LP200	Object	There should be a presumption against the conversion of isolated farm buildings into dwellings, especially in the AONB or Undeveloped Coast. The policy should, through criteria, provide a presumption against the residential conversions of the more ISOLATED rural buildings into dwellings, preferably anywhere within the Countryside, but certainly within the AONB and Undeveloped Coast.
HOU7	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree - Would be best if used under policy HOU4 as a priority.
HOU7	West, Dr Louisa (1210536)	LP054	Object	The rural areas are suffering as absent landowners/farmers convert properties/buildings they are no longer using into holiday rental properties. The designs are often not in character with local buildings and the increased traffic and parking needs is all harming the quality of life for local residents.

Individuals	Number Received	Summary of Responses (Policy HOU7)
Summary of Objections	2	Comments reflected that there should be a presumption against the conversion of isolated farm buildings into dwellings, especially in the AONB or Undeveloped Coast. Concerns that buildings converted into holiday lets are not in character with local buildings and result in increased traffic and parking needs which harm the quality of life for local residents.
Summary of Supports	1	One supports this policy, would be best if used under policy HOU4 as a priority.
Summary of General Comments	0	None received.
Overall Summary		Issue raised advocated a presumption against the conversion of isolated farm buildings into dwellings, especially in the AONB or Undeveloped Coast and the linkage of the policy to HOU4. Concern expressed that buildings converted into holiday lets are generally not in character with local buildings and result in increased traffic and parking needs which harm the quality of life for local residents.
Council's Response		Noted Consider comments in the finalisation of the policy and that of HOU4. It should be noted that permitted development rights laid down by national policy are also a consideration.

Policy HOU8 - Accessible & Adaptable Homes

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU8	Mr & Mrs Johnson (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree
HOU8	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Building construction must be of the Passivhaus standard.
HOU8	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All new homes should be built to current ‘adaptable house’ design standards.
HOU8	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Ensure design and build standards require low or neutral carbon footprint energy usage by specifying renewable energy source systems to passive-house standards to address part of the climate change demands agenda and prepare for new regulations which are inevitable during the life of the Plan.

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Individuals	Number Received	Summary of Responses (Policy HOU8)
Summary of Objections	1	comments focused around the requirement for higher construction standards (Passivhaus standard)
Summary of Supports	1	One support received.
Summary of General Comments	2	comments highlighted the need to adaptable properties and the requirement to build to low or neutral carbon footprint
Overall Summary		Limited comments received on this policy. Where comments were received they focused on construction standards
Council's Response		Comments noted

Policy HOU9 - Minimum Space Standards

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU9	Johnson, Mr Jamie (1216384)	LP342	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Although the proposed minimum space standards should be applauded for their benefit to well being and healthy spaces there should be some caveat pertaining to tourist and holiday accommodation which, if in keeping with much of the distinctive historic character holiday accommodation of the area (as highlighted in paragraph 9.61) is often below the figures set out in Table 2 Minimum gross Internal floor areas and storage.
HOU9	Johnson, Mr & Mrs Johnson (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. See comment Not at the expense of HOU6 or ENV policies.

Individuals	Number Received	Summary of Responses (Policy HOU9)
Summary of Objections	0	None received
Summary of Supports	2	Conditional support for the approach - tourist accommodation should not be an exception.
Summary of General Comments	0	None received
Overall Summary		Limited comments received on this policy. Limited comments received on this policy. Where comments were received they focused on support in relation to the benefits of providing healthy spaces to improve well being
Council's Response		Comments noted

Policy HOU10 - Water Efficiency

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU10	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree
HOU10	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Water is going to be in short supply and new developments should in principle rely on existing supplies and not imported water from elsewhere which will become more and more controversial as time goes on. If this constraint reduces the number of new dwellings in N.Norfolk so be it.

Individuals	Number Received	Summary of Responses (Policy HOU10)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy.
Summary of General Comments	1	One comments that new development should rely on existing supply of water, not imported, if this constraint reduces the number of new dwellings in North Norfolk so be it.
Overall Summary		Limited comments received on this policy. No substantial issues raised.
Council's Response		comments noted

Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU11	Addison Elaine (1210267)	LPO75	Object	obligations placed on developers for carbon-neutral developments.
HOU11	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. BUT not if the materials used are inappropriate under policy HOU6. Not if materials provide poor durability or high maintenance as that may affect uptake and older people in particular.
HOU11	Mooney, Mr Raymond (1210675)	LP112	General Comments	Whilst supporting the need for a draft plan in order to avoid a piece meal approach to future development. Instead of meeting sustainability for developers and mitigating the environmental impact of the development, there needs to be a much bigger emphasis of reducing, let alone mitigating the environmental impact. Following the declaration by NNDC of a Climate Change Emergency after the draft plan was published. The draft Plan in it's current form is not fit for purpose. To include solar thermal (solar heated hot water), solar PV (electric) air source & ground source heat pumps, and these should be policy requirements for all new builds. Carbon-off-setting modelling for entire project, so that we work towards this whole development being carbon neutral. We are losing a lot of land, we will be generating a lot of greenhouse gases, we must offset this somehow.
HOU11	Rose, Mr Alan (1217227)	LP582	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: New houses should look at using solar and heat pumps and the saving of rainwater for all houses to be used for flushing (WC's), cleaning cars, etc. There could be a central parking area away from some towns such as North Walsham to then use an electric bus into the town centre for shopping or work. This would reduce the environmental impact and also take away a lot of traffic from the town.
HOU11	Drury, Mrs Margaret (1210793)	LP086	General Comments	The policy states that "The above standards should be achieved as a minimum unless, it can be clearly demonstrated that this is either not technically feasible or not viable". I do not think there should be any let out for developers. All new homes should be built to good design and space standards. All should be designed to as near Passiv house standards as possible, with grey water recycling, solar water heating, solar heating and/or ground source heat pumps. Each large site should include some allotments and new planting of trees and wild areas. I am pleased to see electric vehicle charging included.
HOU11	Brooks, Mr David (1217039)	LP251	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Climate change is a major concern so how is the Local Plan encouraging existing and new builds to use Solar Panels and Heat Pumps in order to reduce reliance on fossil fuels?
HOU11	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: • All new homes should be built to the highest environmental standards and energy efficiency, located close to local facilities to minimise car use
HOU11	Hall, Mr Stephen (1215856)	LP223	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Since the start of the plan a Climate Emergency and Zero Carbon targets have been announced the plan needs to reflect these and be more robust in its approach. A move away from Houses with Gas/Oil, installation of solar panels as standard, provision of electric charging points within each residential unit.
HOU11	Hull, Mrs Alicia (1210435)	LP763	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: . I hope your declaring a climate emergency means you will follow the demands of the Extinction Rebellion, to tell the truth, to take action and to support a Citizens Assembly to direct policy. Telling the truth will mean acknowledging the harm done by recent policies, as well as giving full facts about the costs and benefits of any future plans. Since declaring the climate emergency, all housing needs to be at minimum construction costs and with the minimum use of carbon for heating, and any carbon costs need to be offset.
HOU11	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Establishing a 'North Norfolk Rule' for reducing the impacts of Climate Change. The “Merton Rule” was established in 2003 to ensure that all commercial buildings have to create at least 10% of their energy from renewables. This is old hat. Renewables are far less expensive and much more available than in 2003 so such a rule needs both to be upgraded and considerably

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
				widened. We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.
HOU11	Bell, Ms Jane (1218416)	LP799	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly support this crucially important policy as a response to paragraphs 9.49 & 9.50. (Paragraphs 9.76 & 9.77 are particularly valid.) However, it lacks equally crucial detail and there is a huge difference between desirability (the auxiliary verb 'should', i.e. 'duty', 'obligation', is repeated) and an enforceable imperative. Suggested Change In practice, are developers going to install, for example, photovoltaic panels and ground source heat pumps? Are they prepared to cover the cost which will have to be passed on to the owner? And what happens if/when it becomes statutory (?) for gas consumption to be phased out? p. 235
HOU11	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All new homes must be carbon-neutral as far as possible. This means: a. they must be able to generate most of their power, heating, and hot water requirements through solar thermal, solar PV, and ground source and air source heat exchangers. These technologies all exist and if they are incorporated into new build their add-on cost is negligible. This will increase demand for local supplies of the necessary products, installers, and maintenance staff, thus creating more local industries and local jobs. b. They must be as well insulated as possible. Probably triple-glazed, and meeting the highest standards of thermal insulation. c. The process of building them must be as low-carbon as possible and any surplus embedded energy must be mitigated. All new homes must be sustainable. This means: b. They must not have gas or oil supplies to them. c. Biomass boilers are not sustainable and must not be installed.
HOU11	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are useful elements within this policy; in particular, those enumerated within item 1b - “incorporation of measures to maximise opportunities for solar gain through building orientation...” and so on. Just the same, we are not persuaded that the policy is sufficiently demanding. As we have observed elsewhere, North Norfolk has declared a climate emergency. A reduction in CO2 emissions of only 19% below the target emission rate of the 2013 edition of the 2010 Building Regulations would seem a paltry ambition when there are so many examples of Passiv or carbon neutral housing to be found. We believe too that this policy should make provision for schemes of community energy, for example air and ground source heat pumps and photovoltaic panels. We would like to see a higher target for the reduction of CO2 emissions with a requirement for community energy schemes to be designed into new developments of all kinds, whether residential or employment sites.

Individuals	Number Received	Summary of Responses (Policy HOU11)
Summary of Objections	3	Objections received to this policy generally supported it but thought it did not go far enough, considering that the policy could do more to ensure that all homes are of the highest environmental standard and move towards carbon-neutral .
Summary of Supports	1	One specific response supported the policy.
Summary of General Comments	9	General comments supported the need for a policy but a larger emphasis was needed on ensuring developers deliver appropriate and high environmental standards in response to the declaration of a climate change emergency by the Council. All new homes should be carbon-neutral, sustainable, Passive House standards, with solar and heat pumps and grey water recycling and the policy approach should be more prescriptive with developers moving away

		from reliance on fossil fuel for heating now. Support for Large sites including allotments, planting of trees and wild areas along with electric charging points within each residential unit was clear.
Overall Summary		The policy doesn't go far enough - all homes should be of the highest environmental standard and should be located close to facilities to minimise car use and the policy should be more robust to meet the growing challenges. Should introduce a new North Norfolk Rule. Plan out of date as developed before climate emergency declared. Policy lacks crucial detail to make it enforceable. New homes should be carbon neutral to Passive House standard with solar, heat pumps and grey water recycling and electric charging points. Any carbon needs to be offset. Large sites should have allotments and trees/wild areas. Introduce Park and Ride. Suggest that this policy make provision for schemes of community energy, for example air and ground source heat pumps etc. and like to see a higher target for the reduction of CO2 emissions.
Council's Response		Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future in accordance with the 2015 written ministerial statement and the Government's new net zero target moving toward net carbon by 2050. Meeting the target by 2050 will require further significant increase in the use of renewable technologies and the switch to low carbon heating such as heat pumps. The Government is consulting (Oct -Dec 2019) on a future homes standard through building regulations that includes options to increase energy efficiency standards for new homes in 2020 and a requirement to ensure future homes to be future proofed with low carbon heating by 2025. Changes in national policy will also need to be considered in the finalisation of this policy.

Economy Policies

Policy ECN1 - Employment Land

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN1	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Employment areas should consider the availability of local workforce and not encourage commuting and travel of long distances.
ECN1	Bluss, Mr Andrew (1210045)	LP027	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The argument that you need to hold space for industry is a false one. Heavy industry left North Walsham for a reason. It is not coming back in any way shape or form in the scale it was. The economy has changed. So to should the thought processes of those who seek to hold this valuable land “in reserve”. Shouldn't retain this land for employment.
ECN1	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support for businesses and jobs should focus on keeping young people in North Norfolk, developing green energy and cutting edge digital developments, modern tourism and farming, caring for an ageing population, employing an older workforce.
ECN1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: ECN1 identifies a total of 285.54 ha of land to be designated/allocated and retained for employment generating developments. This figure should be amended to a minimum in order to plan positively for employment and housing growth and realise the Council’s objective of delivering social and economic benefits. Total land to be designated/ allocated for employment should be a minimum.
ECN1	Archson George (1210391)	LP043	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: EMP08 & F10 I welcome the possibility of more employment possibilities in EMP08.

Individuals	Number Received	Summary of Responses (Policy ECN1)
Summary of Objections	2	Objections focused on the Council providing support for businesses and jobs for young people. Develop green energy and cutting edge digital development, modern tourism and farming, caring for an ageing population, employing an older workforce. Shouldn't keep hold of industrial land in North Walsham, the economy is changing.
Summary of Supports	2	In support of the policy the Council should consider the availability of local workforce and not encourage commuting and travel of long distances. Welcomes the possibility of more employment on EMP08
Summary of General Comments	1	Comment focused on the opinion that total land to be designated/ allocated for employment should be a minimum in order to plan positively for employment and housing growth.
Overall Summary		No substantial issues raised on the distribution or quantum of employment allocations
Council's Response		Noted

Policy ECN2 - Employment Areas, Enterprise Zones & Former Airbases

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN2	Terrington, Mr Peter (1215743)	LP154	General Comments	The Great Eastern Way industrial Estate has been in a downward spiral of decay for many years, beginning when the former Cartwright & Butler factory closed. This building is now abandoned and is in a derelict state. Some of the smaller units are also unoccupied and in a poor state of repair. The parking area between the former C&B factory and the smaller units is cluttered with abandoned containers and boats. The Wells Town Council has brought the matter to the attention of the NNDC on several occasions and the Enforcement Board was aware of the situation. It is believed that the derelict property is in the ownership of a single owner. There is a potential purchaser for the site and a sale and regeneration of the site could be facilitated by the Council, using its powers of compulsory purchase. The area, east of the old railway cutting, is outside the development boundary of Wells. It is a brownfield site. Historically it was associated with the import of coal, brick making and lime production with some residential use. After the Second World War the northern end was used predominantly by the fishing industry and to a lesser degree by commercial enterprises. More recently there has been an increase in marine use, for boat storage, with a growing number of small recreational cabins and artisan workshops. The southern half of the area has seen further residential development by way of a substantial increase in the footprint of existing properties and addition of ancillary cabins in the gardens of existing properties. There is a significant storage facility for the fishing industry to the extreme south of the area. A proposal was made to bring this area into the development boundary of Wells in the last LDF but this was rejected.

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Individuals	Number Received	Summary of Responses (Policy ECN2)
Summary of Objections	0	None received
Summary of Supports	0	None received
Summary of General Comments	1	Suggestion that the potential for employment opportunities could be enhanced by regenerating the Great Eastern Way industrial Estate and enhancing the landscape character of the site. Greater flexibility for unlocking the employment, recreational and residential potential of the area east of the old railway cutting would be achieved by bringing this area within the development boundary of Wells.
Overall Summary		No substantial issues raised. Specific comments received promoting the Great Eastern Way Industrial Estate in Wells on the Sea including the site east of the old railway cutting into the settlement boundary to provide flexibility of employment, recreation and residential coming forward.
Council's Response		The policy does not identify employment allocations but sets the policy content for its use. The Great Eastern Way Industrial site is already designated for employment.

Policy ECN3 - Employment Development Outside of Employment Areas

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN3	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Should not be implemented at the expense of HOU6 which should also apply as far as possible to employment development.

Individuals	Number Received	Summary of Responses (Policy ECN3)
Summary of Objections	0	None received
Summary of Supports	1	Conditional support for the approach - it should not be at the expense of HOU6 which should be applied to employment development.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised. One comment of support for this policy however it should not be at the expense of HOU6 which should be applied to employment development.
Council's Response		Noted. Disagree. Policy HOU6 manages the impact of replacement dwellings. The provision of employment outside of employment Areas is a separate matter.

Policy ECN4 - Retail & Town Centres

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN4	Walker, Mrs Kerry (1217345)	LP331, LP350	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY ~Questions the approach to retail provision and growth in the Local Plan.</p> <p>~why does the draft Local plan only plan 10 years in advance and has not taken the evidence from the 2017 Retail Study to allocate floor space for the whole 20-year period up to 2036</p> <p>~the proposed approach will cause further leakage to Norwich or other centres.</p> <p>~the suggested approach of providing opportunities for future development on surface car parks around the centre will impact on car parking capacity and may increase leakage</p> <p>~the proposed approach will not address the dominance of Roys. Seeks the removal of planning powers of the BA in respect to Hoveton's retail growth. The increase in floor space for convenience food over the 20 year plan period. The creation of a policy to protects A1-A5 independent shops in the extended primary shopping area as set out in and recommended by the evidence in NNDC's 'North Norfolk Retail and Main Town Centre Uses 2017 Study' Incentives for existing and new independent retailers outlets to uptake the allocated growth in retail floor space for Hoveton.</p> <p>~raised concerns over the BA role in retail and suggested there are complexities as a result of the dual authorities</p>
ECN4	Broadhead, Ms Beverley (1217202)	LP289	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NNDC need to radically rethink what 'community' looks like. The traditional high street both at village and town level are changing. Digital technologies and vital services need to be embedded in the centre of town alongside places where people can work and live. Many shops have undeveloped, potential living and work spaces above them and the council should be working with landlords to develop these 'slack' spaces, where existing infrastructure is in place, rather than looking to build on valuable green field spaces. The high street is changing, but having people living and working in centres will increase footfall, increase out of hours business potential and small, independent retail outlets will then begin to find a market. Reducing the need for car travel will make places more attractive, create less pollution, increase overall health and wellbeing.</p>
ECN4	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Existing sites within the town (e.g. brownfield, empty commercial properties) must surely be considered as a priority before new builds, to reduce environmental impact and make the most of developmental opportunities we already have, whilst also improving and reinvigorating the town centre.</p>
ECN4	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Food and eating habits are another source of carbon costs. Again, NNDC is not in control, but , working with others like the Tourist Board, it can help to educate people into the benefits of more vegetarian diets and promote this is all its institutions and among local restaurants and hotels. It can also promote simple cooking as opposed to highly processed foods. It can support allotments, and local farm sales. No more supermarkets should be given planning permission. They have heavy carbon costs. The treatment of waste is another area it could influence.</p>
ECN4	Johnson, Mr & Mrs (1215700)	LP143	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. The sustainability of local centres of facilities such as shops and businesses depends upon those businesses having trade. Excessive parking charges and lack of parking for users and operators discourages use of such businesses. This should be borne in mind when setting rates.</p>
ENC4	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support a policy which privileges a town centre first approach and we would question the advantage of further large scale retail development at a distance from our primary shopping area. North Walsham is a historic market town. It is important to us that our town centre be protected both in terms of its independent retail offer and its historic fabric. We welcome the statement that development that under the draft plan proposals would be supported "provided that development respects the character of the centre, including its special architectural and historic interest, and assists in maintaining its retail function." North Walsham's market lies at the heart of</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				our conservation area and the market contains many listed buildings. The conservation of these buildings is vital to the appeal of our town. We are minded to favour the locally derived impact threshold for North Walsham and we too would be inclined to permit residential use above the ground floor level. We believe that it is always preferable that historic buildings be occupied rather than left empty. We would like to see this policy upheld and implemented.

Individuals	Number Received	Summary of Responses (Policy ECN4)
Summary of Objections	3	Objections focused on the perception of changing highstreets, Digital technologies need to be embedded in the town centre alongside places where people can work and live utilising spaces above shops and the need to put town centres first. The overall quantum of need was questioned in relation to the evidence study asking why the plan only looks 10 years in advance in relation to floor space requirements. The proposed approach will cause further leakage to Norwich or other centres. Developing car parks will impact on car parking capacity. The proposed approach for Hoveton will not address the dominance of Roys. The roll of the Broads Authority (BA) was also questioned and suggested there are complexities as a result of the dual authorities.
Summary of Supports	1	Support for the policy recognised that town centres remain the focus for retail commenting that no land use planning matters such as the impact of high car parking fees should be taken into consideration when setting rates
Summary of General Comments	2	General comment supported the a policy which "privileges" a town centre first approach and questioned the advantage of further large scale retail development at a distance from the primary shopping area - with particular reference to North Walsham's . Brownfield land in town order should be prioritised to reduce environmental impact, improving the town centre .
Overall Summary		No substantial issues raised. Comments acknowledged that the high street is changing, and suggests that digital technologies should be embedded in town centres, alongside places where people can work and live, potentially above shops. Support a town centre first approach. Questions why the plan only plans 10 years in advance and does not use the 2017 Retail study to allocate floor space for the plan period. Should prioritise brownfield central locations to reduce environmental impact and improve town centres, also reducing the need for cars. Policy and building on car parks will lead to people traveling to other centres. Excessive parking charges and lack of parking for users and operators discourages use of such businesses.
Council's Response		Noted Consider adding the retail projection 2026 - 36 in the final document. The issue of retail capacity is considered by the 2017 NNDC Retail and Town centre study Town centre. Retail evidence found a limited scope for additional convenience and comparison goods floorspace across the district over and above planned commitments but growth would help to address leakage in comparisons goods where investment would help claw back investment and increase footfall. The policy seeks a town centre first approach utilises the sequential approach in order to enhance local provision and utilise appropriate retail growth to contribute to the public realm and visual amenity of surroundings in order to enhance town centres. The policy adopts a whole town approach across Hoveton as the BA is the relevant planning authority for part of the town centre.

Policy ECN5 - Signage & Shopfronts

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN5	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Well-designed signage and shopfronts are another important element in the appeal of our town’s retail offer. As we have stated above, North Walsham’s market lies within a conservation area. Signage has been neglected over the years. It is our position that advertisements and shopfronts should follow the guidance contained within the North Norfolk Design Guide SPD rather than simply having regard to the Guide. We would hope to see a more strongly worded policy than the one proposed here.

Individuals	Number Received	Summary of Responses (Policy ECN5)
Summary of Objections	0	No comments received
Summary of Supports	0	No comments received
Summary of General Comments	1	Well-designed signage and shopfronts are another important element in the appeal of our town’s retail offer. Advertisements and shopfronts should follow the guidance contained within the North Norfolk Design Guide SPD rather than simply having regard to the Guide.
Overall Summary		Limited comments were received on this policy. Well-designed signage and shopfronts are important to the retail offer in towns and should follow the guidance contained in the Design Guide rather than having regard to the guide.
Council's Response		Noted: Consider clarification in future iteration of the Plan

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN6	Fullwood, Mr Tony (1217463)	LP644	Object	The policy is too permissive for the expansion of existing sites given the sensitive locations within which most existing sites are located. The scale of proposed development and the ability to absorb the development should be more closely related to the capacity of a location's infrastructure and the visual impact it will cause. Amend criterion 4 as follows: 4. in the case of business expansions and replacement developments, it is clearly demonstrated that the proposal would result in net benefit in terms of landscape impact and the screening of development throughout the year and ecology when compared to the existing development and would not have a significantly detrimental impact on the amenity of neighbouring land uses, nor on the character of the area or its infrastructure by virtue of increased activity and noise and also impacts on light and highway safety and the operation of the highway network.
ECN6	Tickle, Miss Gemma (1217353)	LP340	Support	To help local investment and financial support of local services I would like to request that a point is added to the policy so small scale development of 1-3 units can be built on vacant or derelict infill/rounding off plots in smaller villages and settlements outside development boundaries where the development meets the conditions of paragraph 10.50 (Holiday/Seasonal Occupancy and 140 day commercial letting). Often these plots are neglected and an eyesore for the village and community and it would be much better use if they could be bringing investment and visitor spend into the area rather than laying empty as an unsightly waste. This would be felt most beneficially in some of the smaller villages in the east of the district. I would respectfully request that an extra point is added between point 2 and 3 (which I'll call 2.b for now) as follows: New-build tourist accommodation, static caravans and holiday lodges(90)will be supported where: 1.the site lies within the settlement boundary of a selected settlement; or 2.the proposal is for the expansion of an existing business; or 2b (requested extra point). outside defined development boundaries in areas designated as Countryside small scale development of maximum 1-3 sustainable units would be permitted where it would result in infilling or rounding off in a predominantly built up area/settlement and only where it meets the conditions of paragraph 10.50 (Holiday/Seasonal Occupancy and 140 day commercially available letting). 3. the proposal is for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3;(91); and in the case of all of the above, in the case of business expansions and replacement developments, it is clearly demonstrated that the proposal would result in net benefit in terms of landscape and ecology when compared to the existing development and would not have a significantly detrimental impact on the amenity of neighbouring land uses , nor on the character of the area by virtue of increased noise and also impacts on light and highway safety and the operation of the highway network. Supporting evidence: NPPF Paragraph 84.On Planning policies encouraging opportunities to use land and sites that are physically well related to existing settlements. NPPF Paragraph 83.a) on Planning policies enabling sustainable growth in rural areas through well-designed new buildings. NPPF Paragraph 83.c) On Planning policies enabling 'sustainable rural tourism and leisure developments which respect the character of the countryside'.
ECN6	Johnson, Mr Jamie (1216384)	LP529	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Para 5.7 the economic prosperity of North Norfolk irrevocably linked to the success of the tourist sector. If sensitively conceived small scale developments of 1-3 units on infill/rounding off sites within existing settlements in the designated Countryside were permitted e.g. on both brownfield, derelict/neglected and greenfield sites, it could provide the desirable diverse mix of tourist accommodation more widely across

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>the district as well as delivering the 'positive impact on the economy' whilst also satisfying several NPPF policies on fostering and enabling a thriving sustainable rural economy without compromising the natural environment which draw tourists to the area whilst offering increased visitor options and year-round amenities. Following the loss of the current Local Plan's policy EC2 which allows the re-use of buildings in the countryside for holiday accommodation provided they comply with the former policy EC9 (Holiday and seasonal occupancy conditions' which restricts holiday use to short term lets/occupancy), I would suggest that such infill development in existing settlements in designated Countryside could be restricted to the same limitations mentioned in draft local plan paragraph 10.50 (holiday/seasonal occupancy conditions and 140 day commercial availability) to enable increased local investment and broader area-wide economic benefits. NPPF Paragraph 83 "Supporting a prosperous rural economy" states "planning policy and decisions should enable a) the growth and expansion of all types of businesses in rural areas" and also enable "c) sustainable rural tourism and leisure developments which respect the character of the countryside" . If the conditions proposed below are deemed too lenient then I would suggest each development could be required to conform with 1 or more of the following suggestions: 1) It caters to 'eco tourist' holiday makers; specifically serving the district's long distance cycling and walking paths. (Similar low impact walking/hiking/cycling accommodation schemes have been highly successful across Canada, Scotland, etc.). Schemes could also cater to specific open air leisure enthusiasts such as paddle boarders, canoeists, etc. . 2) The development adds diversity to the tourist stay opinions by offering exemplary eco water, energy, construction and renewables efficiency. Such development would offer ultra-low emission and plug-in vehicle charging facilities, secure bicycle parking, include family bicycles as standard and follow growing trends towards low carbon semi-off grid tourist stays 3) The development would extend the tourist season. The development would also incorporate various biodiversity encouraging measures in its build and landscaping and could be partnered with local/national nature conservation groups such as Norfolk Wildlife Trust or The RSPB to promote the protection/appreciation/study of local/migrating species. . 4) The development would cater for wheelchair users and the elderly by incorporating accessible and adaptable facilities. . 5) The development would follow draft local plan's paragraph 10.49 (being situated in an area proven to be able to incorporate further visitor numbers without detrimental effect to the environment). . 6) The development would focus on an element of an Art/Craft/wellbeing retreat/workshops where participants make work as well as visiting and exploring distinctively local craft/cottage industries. . 7) The development celebrates Norfolk's culinary traditions and crafts where guests can attend workshops learning skills involving locally sourced ingredients whilst also visiting distinctively local food producers, makers and growers. . 8) The development celebrates Norfolk's architectural and historic assets. Some supporting evidence: NPPF Paragraph 80, 102, 131, 151 and 154.</p>
ECN6	Wilson, Mr Iain (Hill, Mr Iain Bidwells) (1217197 1217161)	LP304	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whilst the general principle of Policy ECN6 is advocated, notably the support, in principle, for the development of new build tourist accommodation, it is requested that changes are made to the policy to ensure that it is consistent with, and sufficiently flexible to respond to, market requirements and conforms with the National Planning Policy Framework (NPPF). As drafted, Policy ECN6 contains a presumption against new build tourist accommodation in the countryside, unless it relates to the expansion of an existing business; precluding the opportunity for new business ventures to locate in a rural area. This is notwithstanding that at paragraph 10.49 of First Draft Local Plan (Part 1) it states that in order to support the tourism economy and provide facilities that will also benefit the local community 'new tourist accommodation and attractions will be permitted in areas that can accommodate additional visitor numbers without detriment to the environment.' It is, therefore, suggested that rather than excluding new build tourist</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				accommodation in the countryside, Policy ECN6 should recognise that applications for new build tourist accommodation, which is not linked to an existing business, will be permitted in the countryside where it can be demonstrated that the proposal would not have a detrimental impact on the environment. It is, therefore, recommended that the policy is revised in order to ensure that the policy is consistent with the NPPF and, crucially, that the requirements of the tourism sector are met, allowing the economic benefits detailed at paragraph 10.45 to be realised
ECN6	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
ECN6	Rice, Mr Colin (1210475)	LP131	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. By permitting individual holiday homes that build on the character of such homes in the coastal strip (as recognised in the LCA p.155), some of the demand for second homes could be met without there being a negative effect on availability of the existing housing stock for local people. 2. As noted in NPPF paragraph 154, LPAs should recognise that even small-scale projects provide a valuable contribution to cutting GHG emissions and indeed can act as exemplars.
ECN6	Rice, Mr Colin (1210475)	LP132	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan as drafted does not recognise the place of small scale holiday cabins that are not situated within large scale commercial caravan or chalet parks. These currently form part of the long-established character of places such as Bacton, Walcott, Eccles, and Sea Palling and are overlooked in the plan. By allowing small-scale growth and development, the existing communities will continue to prosper and the demand for second homes could be met without such disruption to the general housing market. This would be in accordance with NPPF paragraph 83(c) which says that 'Planning policies and decisions should enable sustainable rural tourism and leisure developments which respects the character of the countryside'.

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Individuals	Number Received	Summary of Responses (Policy ECN6)
Summary of Objections	3	Objections recognised the importance of tourism to the North Norfolk economy, however comments were mixed with some considering the expansion of existing sites within sensitive locations as too permissive and the policy should consider the scale of development, the infrastructure available in that location and the visual impact of development. Other respondents felt that the policy should be more flexible and allow new build tourist accommodation in the countryside which doesn't have a detrimental impact on the environment. Such as small scale tourist accommodation infill / rounding off built up areas and existing settlements that meet certain criteria. In order to provide a mix of accommodation across the district and deliver positive impact on the economy without compromising the natural environment.
Summary of Supports	2	Support for the approach suggested that the policy should also allow for small scale development on vacant/ derelict infill/ rounding off plots in smaller villages outside development boundaries which are subject to holiday occupancy conditions. To improve neglected sites and bring investment into the

		area, which is considered could be especially beneficial to small villages in the east of the District. Development should not be at the expense of any environmental policies and subject to similar requirements to HOU6.
Summary of General Comments	2	Respondents suggested that by allowing individual holiday homes that build on character of the homes in the coastal strip would meet some of the need for second homes without have a negative effect on the availability of the existing housing stock for local people. LPAs should recognise that even small-scale projects provide a valuable contribution to cutting GHG emissions. The policy as drafted doesn't recognise the importance of allowing small scale holiday cabins in places such as Bacton, Walcott, Eccles and Sea Palling where these currently form part of the long-established character and would allow existing communities to prosper and also meet the demand for second homes.
Overall Summary		Some support for this policy, recognising the importance of tourism and the environment on North Norfolk's economy. The majority of comments suggest that the policy should be more flexible and allow for small scale tourist accommodation which wouldn't (their emphasis) have a detrimental impact on the environment within the countryside rather than just be focused on the settlement hierarchy. However, another respondent considered the policy to be too permissive, need to carefully consider potential impact of extending existing businesses within sensitive locations.
Council Response		Noted Consider comments in the finalisation of the policy and in relation to core strategy policy EC 2, and general consistency with other rural policies and those in relation to the expansion of existing business'

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN7	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
ECN7	Johnson, Mr Jamie (1216384)	LP523	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Make a case for an amendment to criterion 3 changing the excluded area to flood risk zone to 3b only so that small scale sites (of upto 5 units) in flood zone 2, 3a or 'dry islands' could be permitted where they are protected by hard sea defences (where the adopted defence strategy is predicted by to “Hold the Existing Line” for the next 85 years until at least the year 2105 (Coastal Management Study). As some Flood Zone 3a land is deemed less suitable for building permanent residential dwellings it would seem that a good way to utilise such land would be for sensitively landscaped low impact glamping/shepherds hut sites (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). This would allow such land to meet economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside. These sites would have to meet criterion 4 of policy ECN7 and would provide a low impact sustainable addition to the tourist offer and would be in line with the stipulation stated in NPPF paragraph 83. on "Supporting a prosperous rural economy"; "planning policy should enable a) the growth and expansion of all types of businesses in rural areas" and also enable "c)sustainable rural tourism and leisure developments which respect the character of the countryside” .Amend criterion 3 ‘Flood Risk Zone 3’ to ‘3b’ to allow small scale sites of up to 5 units in flood zone 2, 3a or 'dry islands'.</p> <p>The use of land(92) for touring caravan and camping sites(93)will be supported where: 1. the site lies within the settlement boundary of a selected settlement; or 2. the proposal is for the expansion of an existing business; or 3. (requested amended point) the site lies outside of the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3b. Sites which lie in areas protected by hard sea defences in flood zones 2 and 3a will be supported where seasonal usage restrictions are applied to mitigate against flood risk.* . *If more restrictions where deemed desirable then potential 2 and 3a Flood Zone sites could be made to satisfy one or more of the following conditions. Sites are: 1) are small in scale being 5 units or less, 2) are within a Tourism Asset Zone, 3) are compliant with local draft plan paragraph 10.50 (holiday occupancy restricted with 140 day commercially available lettings stipulation), 4) are comprised solely of Shepherds huts (which are less visually imposing on the landscape and encourage a diverse low impact tourist stay option aside from traditional camping). (Also their raised design makes them much more in keeping with the current flood resilience advice from the environment agency). 5) are accompanied by a site specific Flood risk assessment detailing compulsory flood safety measures such as warning systems and egress routes etc. 6) The sites would fall within infill/rounding off sites within existing settlements/predominantly built up areas within designated Countryside. 7) Each unit will be highly sustainable using Solar PV/solar thermal, renewable technologies and other sustainable off grid technologies for water, heating and power efficiency and sustainability. Sites could cater specifically for the district's long distance walking and cycling paths to avoid travel by car and also provide family bicycles, secure bicycle parking and charging points for ULE and plug-in vehicles. . Any proposed site within flood zone 2 or 3a where protected by hard sea defences would still have to meet the criterion in point 4 of the policy ECN7.</p>

Individuals	Number Received	Summary of Responses (Policy ECN7)
Summary of Objections	1	Objection focused on allowing a more permissive approach and made the suggestion that the policy should allow for: small scale sites of up to 5 units in flood zone 2, 3a and 'dry islands' and low impact glamping/shepherds hut sites in Flood Zone 3b (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). To allow this land to meet economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside.
Summary of Supports	1	One comment in support of this policy but development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		Limited comments and no substantive issues raised. Objection focused on allowing a more permissive approach by allowing more flexible development of small scale sites of up to 5 units in flood zone 2, 3a and 'dry islands' and low impact glamping/shepherds hut sites in Flood Zone 3b (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). Stating that this would allow economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside. One comment received in support of this policy but suggests that development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Council's Response		Support noted. Disagree with a more flexible approach around flood risk. The National Planning Policy Framework sets strict tests to protect people and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, national policy is clear that new development should not be allowed. In plan-making, local planning authorities apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk.

Policy ECN8 - New Build & Extensions to Tourist Attractions

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN8	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.

Individuals	Number Received	Summary of Responses (Policy ECN8)
Summary of Objections	0	None received
Summary of Supports	1	One comment of support received, development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised.
Council's Response		Noted

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN9	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.

Individuals	Number Received	Summary of Responses (Policy ECN9)
Summary of Objections	0	None received
Summary of Supports	1	One comment of support received, Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised.
Council Response		Noted

Vision, Aims & Objectives

Vision, Aims & Objectives

Section	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
Vision & Aims	Addison Elaine (1210267)	LPO75	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Obligations placed on developers for carbon-neutral developments.- My initial observations of the published local plan for consultation suggests very little regard has been given to green or climate change issues. There is for example little regard given to the carbon foot print caused by digging up agricultural land. E.g. just ploughing farmland creates 15-20% of atmospheric carbon dioxide. I would urge NNDC to conduct carbon calculations modelling for this development on greenfield sites. What impact will there be on local wildlife with the removal of hedgerows and other current habitats? I would urge NNDC to ensure that wildlife, SSSI's, and the natural environment are taken into greater consideration than, say, the incident at Bacton cliffs which caused national humiliation.
Vision & Aims	Addison Elaine (1210267)	LPO75	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: My initial observations of the published local plan for consultation suggests very little regard has been given to green or climate change issues.- There are other climate issues which have been mentioned in the consultation document, but these issues fall short of placing obligations on developers. This shortfall includes the following: • No cycleways to support new housing • No commitment to carbon offsetting • No obligation for developers to use renewable technology • No obligation for developers to use rainwater harvesting • No obligation for developers to install electric car charging points on new homes • No park & ride There should also be more attention given to identifying brown field sites. The plan, seems to us, to be focused on housing for commuting rather than including planning to increase the local economic activity to thereby increase the opportunity for local employment. The extra commuting will obviously increase the amount of greenhouse gases being produced. I would urge NNDC to conduct carbon calculations modelling for this development on greenfield sites. What impact will there be on local wildlife with the removal of hedgerows and other current habitats? I would urge NNDC to ensure that wildlife, SSSI's, and the natural environment are taken into greater consideration
Vision & Aims	West, Dr Louisa (1210536)	LP056	Object	<i>Maximising the economic, environmental and social benefits of tourism</i> must be allowed if it is detrimental to local, full time, residents. The benefits must be balanced, not 'maximised'.
Vision & Aims	Carr, Mrs Elizabeth (1216730)	LP385	General Comments	More emphasis needs to be made of the historic buildings in the area especially the churches. Church trails following bus routes, footpaths, cycle routes, etc. that are clearly marked would energise the local economy/community and provide more tourism to the area. Places that have been used in films are also potential sources of tourism.
Vision & Aims	Carr, Mrs Elizabeth (1216730)	LP393	Support	Broadband provision needs to be better than good, currently, so as to be able to cope with future increased demand. In a rural setting, reliance on the internet for business and social use is crucial to delivering sustainable development. Underground all new utilities as this preserves the character of the local area. Change the order of the bullet points making Broadband provision a higher priority.
Vision & Aims	Spowage, Mr Richard (1216878)	LP325	General Comments	The proposal fails to mention provision of local open access parks of sufficient size to support local residents and children needs for a space to enjoy outside activities from football, cycling, running, flying kites or just walking dogs. I wish to see a commitment for each urban centre to create new large parks to meet growing population needs.

Section	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
Vision & Aims	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 3.2. The broad plan objective of delivering sustainable development and meeting accommodation needs of existing and future residents by delivering the quantity of homes necessary to meet assessed needs and providing a variety of house types, sizes and tenures is supported.
Vision & Aims	West, Dr Louisa (1210536)	LP053	Object	All developments should be quality, and not an undefined 'high quality'. It is also unclear what is meant by 'context'. Recent developments converting farm buildings, right beside existing old farm houses, may seem to be 'quality' and in context, but they are not in character to the local surroundings, style and local building materials. Consideration must be given to whether designs using lots of timber/metal cladding; large cobbles not flints and rendered facades are in keeping in North Norfolk. They may be in context on TV design programmes and other parts of East Anglia, but they are spoiling the local character.
Vision & Aims	Woodward, Mrs Josephine (1217427)	LP598	General Comments	How is the plan managing potential impacts on climate change and the detrimental impact of extra environmentally damaging emissions. Emphasising the need to consider the long term effect of our actions
Vision & Aims	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In addition NNDC needs to work with others, such as Norfolk County Council, on a range of policies where it does not have full control but can have some effect, or, at the very least lobby for change. There is no shortage of ideas and knowledge. Some of my own are listed below, but I seriously recommend wide consultation and the use of environmental experts.
Vision & Aims	Woodward, Mrs Josephine (1217427)	LP597	General Comments	Consideration of the impact the North Norfolk plan in it's current form will have on Norwich itself. Add explanation and consideration as to how our local plan will impinge on our neighbouring areas.
Vision & Aims	Smith, Mr Mark. (1209582)	LP038	General Comments	There is no mention throughout the NNDC Draft Local Plan of any collaboration or feedback from any discussions that may have taken place to combine housing needs across councils as part of a Norfolk Strategic Planning Framework (not what I can find it this massive document so apologies if I have not found it). Against the preferred approach of NNDC the alternative SD3A could have been preferred but used to satisfy the allocation of more than one council and minimise if not avoid altogether the need to extend villages, small towns and in some cases large towns. A more strategic plan to mitigate congestion could have been utilised that would have less impact on established settlements in all factors from pollution to safety. Publish any document that corresponds to cooperating with neighbouring councils.
Vision & Aims	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NNDC have declared an intention to plant trees. Estimates for how much carbon each tree will offset and in what timescale needs to be publicised.

Section	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
Vision & Aims	West, Dr Louisa (1210536)	LP062	Object	The section needs to consider all local residents, not just those in towns. The health and well being of people living in rural areas during the winter months when they are among the very few people still about. Walking through villages with empty second homes, rental properties and neglected vacant homes is not good for well being and a sense of community. Many villages lack paved footpaths and access to public footpaths is often difficult as people have no safe routes to cross the increasingly busy local roads. The document only seems to consider people living in towns or having access to them.
Vision & Aims	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan is a great opportunity to create a better North Norfolk for all who live and work and visit here. A chance to create a long-term vision for North Norfolk and to meet the changing needs of our population. it's important we are ambitious for the future of North Norfolk and how it can lead the country. VISION Making North Norfolk the most environmentally friendly place in the country, where everyone has access to a decent affordable home and transport, where people of all ages can work and learn and businesses can thrive, where people can access the health, care and support they need, where all our communities are nurtured and protected. To achieve this vision, we need a revised local plan that makes this vision the framework for future development and incorporates its priorities into all planning and development briefs.
Vision & Aims	Ringer, Mr Callum (1218565)	LP772	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is a general weakness throughout the document with regards climate change. Although consideration is given, the document is not exactly radical, particularly given our precarious coastline.
Vision & Aims	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Plan out of date as developed before declaring a climate emergency. Planning authority in best place to control carbon emissions in all aspects of construction and to initiate carbon reduction schemes. Council declared intention to become a zero-carbon district and set goals to this effect. Policy now has to be carbon costs. Every policy and scheme needs to be questioned and costed for carbon with expert evidence sought. There are many alternative cleaner technologies. First aim with housing is to see how much can be achieved using existing structures. Then building techniques need to be assessed, and the performance of different building types and other equipment in reducing domestic carbon production. Any building has a cost, so offsetting the carbon produced is vital. Exact carbon estimates for all projects. Choosing those using the least. Increasing carbon saving measures with measurements. wide consultation.
Vision & Aims	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY Sections 4.4.1 on Climate change, and 4.4.2 on energy. This document, and the undated paper 'Planning for Climate Change' are extremely well produced and comprehensive, but they pre-date the climate crisis. HM Government, and NNDC amongst many other authorities, have declared a climate emergency which requires drastic action and change.

Individuals	Number Received	Summary of Responses (Vision & Aims)
Summary of Objections	9	Responders commented that following the recent declaration of climate change emergency by NNDC more emphasis should be placed in the plan in tackling the effects of climate change and delivering sustainable development. Suggested amendments to wording of 'Enabling Economic Growth' Aim and Objectives to ensure economic, environmental and social benefits of tourism are balanced and not maximised. Further clarity was also sought on the interpretation of words in the Contextual sections of the Plan e.g. All developments should be quality, and not an undefined 'high quality'. Working in

		<p>partnership across the District was also thought to be important and a missing element to the Plan by some.</p> <p>In objecting those that responded thought the Plan should consider all local residents and not just those in towns and those living in rural areas, raising concerns such as lack of footpaths, lack of consideration for Historic environment and the impact on wellbeing and sense of community, Caring for an ageing population and older workforce. It is important that the vision is ambitious and is a great opportunity to create a better North Norfolk. Suggested that the vision should make North Norfolk the most environmentally friendly place in the country, developing green energy and cutting edge digital development and set out the framework for future development and incorporate the priorities into all development briefs. Conduct carbon calculations modelling for new development on greenfield sites. Should ensure that wildlife, SSSI and the natural environment are given greater consideration.</p>
Summary of Supports	1	One respondent supported the aims and Vision specifically but requested that the order should be changed making Broadband provision a higher priority in the bullet points.
Summary of General Comments	8	Several commented on the Vision and that the Plan itself needs to focus on sustainable development, detail wider impacts across the county especially in relation to housing provision and how the plan is managing the potential impacts of emissions and climate change.
Overall Summary		Most respondents provided general comments on these sections with several commenting on the Vision. Concerns expressed that that the plan is weak in relation to climate change and out of date as written before the declaration of a climate change emergency. Consider the planning authority in the best place to control carbon emissions in construction and through carbon reduction schemes, suggest that carbon calculations modelling are undertaken for greenfield development. More consideration should be given to wildlife and natural environment and too much emphasis is placed on the towns, and the ability to create footpaths in rural areas and the ability to increase the provision of open space as well as the importance of caring for an ageing population and older workforce. Suggested that the vision should form the framework for future development and all development briefs. Suggested changes to the aims and objectives section, included better broadband and more emphasis on historic buildings and the provision of open space. Raise the importance of NNDC working with other authorities.
Council Response		Noted: Consider comments and clarifications in future iteration of the Plan. Sustainable development and Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. An interim Sustainability Report accompanies the consultation on the First Draft Local Plan. It is recognised that the challenge for the Local Plan is to take a proactive approach through the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future, provides specific policy approaches for greater resilience to climate change, seeks environmental enhancements and the provision of higher quality development including the provision of open space and greater connectivity to the wider GI network. The approach to housing numbers and how the Council has addressed cross boundary land use issues is contained in the Norfolk Strategic Planning Framework and Statement of Common Ground, which sets a high level vision and objectives and a number of formal agreements relating to cross boundary issues where a common approach has been agreed. Partners have committed to ongoing cooperation and this includes the evidence base and use of specialist inputs from across the region. The document is published alongside this consultation and will be updated as part of the iterative process.

First Draft Local Plan (Part 1) Comments

Comments on Proposed Sites

(Submitted by individual members of the public)

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Town & Village Proposals

DS1: Proposed Allocations

Policy	Site Ref	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
DS1	N/A	Binks, Mrs Susan (1217821)	LP667	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All brownfield sites should be used before any greenfield sites are touched.
DS1	N/A	Bluss, Mr Andrew (1218558)	LP027	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Brownfield land used would help preserve an equal amount of greenfield.
DS1	N/A	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The proposals for towns and villages need to be more holistic in nature bringing into account environment, carbon emissions, future technologies, the demise of retail, the increase in aged, single occupancy accommodation, affordable rentable housing for families and improved cycle and footpaths. Development of towns and villages in North Norfolk separates housing development from high street rejuvenation, employment and local services. The addition of housing developments expanding a settlement ignores infrastructures that already exist.
DS1	N/A	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: • Better use should be made of existing housing stock, e.g. reducing under-occupancy and empty homes, as well as occupying other under-used buildings etc.
DS1	N/A	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 2) Developments on agricultural land should be very closely scrutinised and reduced where possible in favour of “brownfield “ sites or simply scaled down; or perhaps judiciously built up .
DS1	N/A	Castleton, Mr Norman (1218485)	LP807	Object	There is far too much development proposed on green field and village sites. The services have not and will not keep pace with this and the environmental impact will eventually be catastrophic. Therefore, I cannot agree with the development of sites as herein proposed or with the developments of roads without due reference to public transport provision.
DS1	N/A	Daniels (1217050)	LP263	Support	Recognises the benefits of allocating land immediately adjacent to built up areas, although this should ideally support sites with defensible boundaries rather than ribbon development which results in the coalescence of settlements
DS1	N/A	Daniels Jennings, Mr Jon Cheffins Planning (Agent) (1217050 1217047)	LP268	Object	A number of sites are identified as being rolled forward from the existing Local Plan and insufficient detail or evidence is provided to demonstrate that a site is actually available, suitable and achievable. Need to undertake a full assessment of the sites rolled over from the local plan to ensure that they meet all of the criteria detailed within paragraph 11.10. Such an assessment should also provide evidence that these sites will be actually brought forward.
DS1	N/A	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Create reserve sites which can automatically come forward if the 5 year land supply isn’t continually met during the life of the Plan and thus ensure developers don’t simply contrive to build where they want. Make requirements for allocations over a certain level of housing units to include mixed use (residential and employment) land allocations to give maximum flexibility to create local employment or infrastructure provisions to enable communities to become more sustainable in terms of less reliance on road travel to work.

Policy	Site Ref	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
DS1	N/A	Duncan, Mr Phillip (1217309)	LP419 LP422 LP427 LP430 LP432	Object	<p>Town proposals We note from para. 11.7 that the Council has done “some initial work”, but para 11.9 suggests “a detailed site assessment of each of the options has been completed”. The two statements do not seem consistent. Para. 11.10 notes that “Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal,” and refers to the methodology set out in the “Background Paper 6 - Site Selection Methodology and results.” Our detailed comment on the Site Selection Methodology Background Paper 6 is set out in the attached analysis which shows many concerns. Paragraphs 11.11 and 11.12 of the Draft Local Plan confirm that the decision on whether a site should be proposed as a draft allocation was made on the basis of the Background Paper 6 and that “as a result the Council is satisfied that the types of development proposed are likely to be deliverable”.</p> <p>However, in relation to para. 11.12 of the Draft Local Plan, we see no evidence in the Background Paper 6 or elsewhere that a site proposed only for housing (C22/1) has been either assessed or been demonstrated to be able to deliver sports facilities. If there is a need for such facilities, other sites too should have been assessed for such potential, but this does not appear to have been the case. Similarly, Paragraph 12.11 suggests the four sites proposed in Cromer are intended to deliver “...two residential care homes...” but it does not appear that any sites were specifically assessed for suitability or delivery of this use, and none of the proposed town policies specify a residential care home. We find inconsistencies in approach in relation to the three Large Growth Towns which are not adequately explained by the location being in or outside of AONB. For example Para 12.8 of the Draft Local Plan suggests, in relation to Cromer, that one of the main considerations influencing the suggested location of development sites is the need to “ensure a choice of medium sized sites are available to improve the prospects of delivery” This statement does not appear borne out. There is no evidence for why this suggested approach is only used for Cromer and not the other Large Growth Towns. In fact, the proposed allocations in North Walsham rely on only two large allocations. Both of these are identified in the Draft Local Plan as having complexities to deliverability, including the need for preparation and adoption of a comprehensive development brief before the site can be brought forward. Indeed, the Draft Local Plan notes (~in para 16.37) that in regard to deliverability of the largest of the two North Walsham sites, “the deliverability of the site will be complex and may take a number of years to come to fruition”. The proposals at North Walsham represent a comprehensive mixed development including residences; link road; primary school; employment and Green Infrastructure. A similar comprehensive approach is evident for Fakenham. No such comprehensive approach to development is evident for Cromer. The Draft Local Plan proposals for Cromer appear piecemeal rather than representing good place making. We note that the sites submitted to the Authority include an opportunity through site C41 for a masterplan approach to the town development, including provision of homes, GI, link road, school and other necessary infrastructure in a cohesive way. Furthermore, in our recent discussions with the Highway Authority, the Authority has confirmed that realisation of such a link road is a high priority. In addition to the apparent inconsistencies identified above, our analysis of the Site Background Paper 6 also raises doubt about the sites proposed for Cromer to deliver appropriate growth for this Large Growth Town. We do not consider the proposed approach or Site Allocations for Cromer to be sound due to the many issues and inconsistencies identified above and in our comments attached and below on: the Background Paper 6; Sustainability Appraisal ; and Draft Local Plan: Alternatives considered. The evidence presented does not justify the approach.</p>
DS1	N/A	Godfrey, Mr Paul (1210905)	LP097	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Phasing of housing is not specifically offered as an option within the documentation. There is no reason why new sites allocated in the Local Plan should not be phased. They would then be available for development should building rates increase and the vast majority of existing</p>

Policy	Site Ref	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
					allocated sites are built-out. However, if house completions remain at existing rates these newly-allocated sites could stay on a reserve list and valuable countryside would be protected. This would be particularly important if Government predictions of population and household growth are reduced further. The SHMA assessments are based on Office for National Statistics, population projections, which are best guess at a point in time. Existing local plans (core strategies), already contain inflated housing targets. Reported in the press recently a number of schools have up to 50% vacancy for places. Brownfield sites should be prioritised for development.
DS1	N/A	Hammond, R. Hon Robert Harbord, Ms Hannah Payne, WSP Indigo Payne (Agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Committed to delivering a proportion of the requirement in the short term. The policy does not include a housing trajectory however, for the local plan to be sound it is imperative that smaller unconstrained sites such as Site Reference C16 come forward to boost supply in the short term allowing large sites to come forward in the medium to longer term. The landowner and development partners are committed to delivering housing in the early part of the plan period on land at Overstrand Road.
DS1	N/A	Needham, Mr Colin (1216785)	LP269	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Fully understand that there is a need for additional housing in the district and that land has to be made available. The designations of growth points is reasonably well argued in the documentation. However, the process of considering each community in isolation is flawed especially with regard to the impact of growth in community A on adjoining communities B,C,D.etc..For example, current developments under the existing plan in Mundesley have had a direct and measurable increase in the traffic (commercial and private) passing through Southrepps. The volume of traffic is now adversely effecting this community. Specifically the adverse impact of increases in commercial, commuter and leisure traffic. If such developments can be properly justified, consideration should be given to mitigation and compensatory measures such as highway improvements, footpaths and cycle ways in all the effected communities.. Developers and landowners benefiting from land allocations should be the principal contributors to the cost of these measures. Our road is narrow, has no pavements and is considered by many to be dangerous such that people get in their car to go to the village shop rather than run the gauntlet of parked cars, heavy lorries and nose to tail cars. Baseline traffic flows are dramatically boosted by holiday traffic especially during the summer and this is a impact that the consultation document suggests that holidaymaking will be encouraged as a positive driver for economic growth in the district. Any further increase in the housing allocation in for example Mundesley, generating commercial and commuter traffic through Southrepps will have consequences for Southrepps and other villages on the B1436.
DS1	N/A	Philcox, Miss Charlotte (1210047)	LP026	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Existing sites within the town (e.g. brownfield, empty commercial properties) must surely be considered as a priority before new builds, to reduce environmental impact and make the most of developmental opportunities we already have, whilst also improving and reinvigorating the town centre.
DS1	N/A	Sanders, Ms A (1217671)	LP661	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: New site proposed. Why is the area south of Roughton considered not suitable? It would be close enough to town (better public transport would be needed) and would be well positioned for road connections (without making the coastal road traffic even worse). Alternatively, the industrial sized fields north or northwest of Northrepps, but away from the village. Access to the A149 would take longer, but the settlement would lie behind the Cromer ridge and so be invisible from Overstrand.

Policy	Site Ref	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
DS1	N/A	Filby, Mr Michael, Partridge, Mrs Lois (Agent) (1217056, 1217052)	LP261	Object	New site proposed. The policy requires that all development and other works comply with the North Norfolk Design Guide. Development of both of my client's sites would fully comply with the proposed guidance set out in the draft North Norfolk Design Guide. We note that the Residential Development section of the draft Design Guide classes developments of 10-49 units as medium scale development, and that the Guide would class our clients' sites as village fringe sites. The Density Guide sets out a Framework for appropriate development in these locations, and notes that appropriate densities of developments in these locations would be 10-30 dwellings per hectare, with irregular form, loose grain and less compact, with landscaped edges and buffer. This guidance is reflected in the indicative masterplans for both of my clients' sites.

Individuals	Number Received	Summary of Responses (Site Policy DS1)
Summary of Objections	9	The responses primarily focus on concerns over allocating Greenfield Land for new development and suggest that Brownfield land and the existing housing stock (Extending or bringing empty homes back into use) should be prioritised in order to limit the environmental impact. They suggest that a more holistic approach is needed for proposals in towns and villages, not just focussing on housing and settlements in isolation. And detailed consideration should be given to the impact of site allocations on adjacent communities. Concerns raised over inconsistencies within this section and the Site Assessment Methodology, specifically in relation to site assessments for Cromer; sites haven't been assessed for their suitability to provide sports facilities or a Care Home including the proposed site C22/1. There is no comprehensive approach taken to development in Cromer like in Fakenham and North Walsham. One member of the public raises concern over the lack of evidence to demonstrate that sites rolled over from the previous plan are deliverable. Two new sites proposed in Roughton.
Summary of Support	1	One support. Recognises the benefits of allocating land immediately adjacent to built up areas, but should be with defensible boundaries rather than ribbon development resulting in the coalescence of settlements.
Summary of General Comments	6	The comments suggest that housing should be phased and new sites should be on a reserve list until existing allocated sites have been developed. One respondent points out that a housing trajectory hasn't been included and suggests that smaller unconstrained sites (including site C16) come forward to boost supply in short term, to allow larger sites to come forward in longer term. The impact of growth in each settlement shouldn't be considered in isolation. Development should be focussed in central locations in order to help reinvigorate town centres and to scrutinise and reduce the amount of development on agricultural land. Priority given to Brownfield Land. Make requirements for allocations over a certain level of housing units to include mixed use (residential and employment) land allocations to give maximum flexibility.
Overall Summary		DS 1 is a generic policy that seeks to allocate the preferred sites "on mass" subject to the separate requirements of each individual site policy. The responses primarily focus on concerns over allocating Greenfield Land for new development and suggested that Brownfield land and the existing housing stock (Extending or bringing empty homes back into use) should be prioritised in order to limit the environmental impact. Housing should be phased and new sites should be on a reserve list until existing allocated sites have been developed. Development should be focussed in central locations in order to help reinvigorate town centres and to scrutinise and reduce the amount of development on agricultural land. Feedback suggest that a more holistic approach is needed for proposals in towns and villages, not just focussing on housing and settlements in isolation. Concerns also raise that there is no comprehensive approach been taken to development in Cromer and sites haven't been assessed for their suitability to provide sports facilities or a Care Home. One respondent points out that a housing trajectory hasn't been included and suggests that smaller unconstrained sites (including site C16) come forward to boost supply in short term, to allow larger sites to come forward in longer term. Concern over the lack of evidence to demonstrate that sites rolled over from the previous plan are deliverable. One respondent supports the policy recognising the benefits of allocating land immediately adjacent to built up areas but without leading to the coalescence of settlements.

Council's Response		<p>The Council is charged with providing sufficient sites to meet identified need. There is very limited brownfield land across the District, suitable sites are identified in the brownfield register. The Local Plan focuses the majority of development closely related to the defined large towns as set out in SD3, to ensure the delivery of sustainable development. Policies HOU2, SD2 and SD3 set out the distribution and type of development required and Policy DS1 seeks to allocate sites required from these policies subject to each specific site policy. The detailed methodology undertaken is set out in Background Paper 6. Settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size, the impact on infrastructure and cumulative impact have all been considered when determining the overall housing numbers for each place and the preferred sites. The additional sites put forward in Roughton will need to be considered in future iterations of the emerging Plan.</p>
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Proposals for Cromer

DS2: Land at Cromer High Station

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS2	C07/2	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS2)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

DS2/163

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DS3: Land at Runton Road / Clifton Park

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)	
DS3	C10/1	Adams, Neil	LP741	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site lies within the parish of East Runton. The previous Plan tried to designate this land for development, and that one of the reasons for rejecting it was the desire to prevent continuous development between Cromer and East Runton. I do not believe this development should take place for the reasons listed:</p> <ul style="list-style-type: none"> • The water treatment works south-west of the site is a source of bad smells. The proposal notes the problem, but we are aware that it will require extensive action on the part of Anglia Water to remedy the situation and increase the capacity of the plant to cope with such a development. Planning developments around such plants are known to be too sensitive to the local situation, especially when such planning involves residential housing and schools. • The site is bordered by 2 main roads and a railway line, hardly a suitable environment for schools and small children • Priority should be for the development of the brownfield Former Structure Flex site, which would involve the removal of contaminated land. • Strongly support the existence of an (unofficial) green belt between Cromer and East Runton, to preserve the identity of East Runton and to provide a distinct boundary to Cromer town. • Although proposed site has good links to the bus and train network, development here would adversely affect the traffic density along the A149 and Clifton Park/Howards Hill/Central Road, creating a "Rat Run" along these roads which were never intended to cope with such traffic density. • Is the government wise to try to push so much new housing onto an area which has few employment opportunities, and slow communications to Norwich and beyond. The councils can build all the houses they wish, but if people don't want to move here for work then they are creating problems for themselves - the majority of incomers will be retirees who will put additional pressure on our GPs, hospitals and social services. • Although we have a brand new GP surgery, it has not attracted medical staff to come and work here and the practice is still understaffed. An increased population will make matters worse. • Many of the residents of Clifton Park were attracted to the area because it was on the edge of town, with easy access to the countryside. One of the selling points of North Norfolk is its attractive towns and villages, and access to beach and countryside is an important factor. We have spoken to a number residents who would seriously consider moving away if this access is made more difficult. • The site itself increases the biodiversity of the area, being an area of heathland which provides a habitat for many species of birds and animals. Bats, Skylarks and Newts have been noted there in the past. • The site is enjoyed by dog walkers who enjoy the paths around the site, and for those living or camping nearby who wish to walk north to the coast or south to the Co-op and other retail outlets on Middlebrook Way. • Previous housing developments have been to the South of the town, where future pupil number would be derived from. Placing a school on C10 to the West of the town would increase the already often gridlocked traffic flow through the town centre several times a day. • Any proposal to build a "Two Form Entry" Primary School on this land flies in the face of known existing 	
		Bamford, Mrs Janice	LP780	Object		
		Bowyer, Mr Jeff	LP775	Object		
		Britton, Mrs Frances	LP813	Object		
		Bromley, Miss Jennifer	LP812	Object		
		Clarke, Mr Mike	LP795	Object		
		Couse, Mrs Irene	LP818	Object		
		Dunn, Ms Danika	LP819	Object		
		Dunn, Mrs Doreen	LP791	Object		
		Hollis, Mr Paul	LP773	Object		
		Hollis, Ms Lynette	LP743	Object		
		Beall, Mrs V	LP768	Object		
		Benedettini, Mrs Jean	LP809	Object		
		B, Mansell	LP822	Object		
		Prior, Mr Pat	LP815	Object		
		Ransome, Mr & Mrs	LP820	Object		
		Ratcliffe, Mr Kenneth	LP796	Object		
		Sault, Mrs Kathryn	LP776	Object		
		Sharp, Mrs Pamela	LP817	Object		
		Shaw, Mr & Mrs	LP793	Object		
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Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
		1218632 1218587)			<p>capacity in the current educational establishments. More so, given the recent County Council investment at Suffield Park Infants and Nursery School. Indeed the District Council's attention was drawn to this and previous anomalies when this site was postulated in the last local development consultation.</p> <ul style="list-style-type: none"> the housing and infrastructure is meant to withstand a "once in 30 years' storm. However, the impact of global warming seems to indicate (a) that these storms will become more severe and (b) that they will occur more frequently than every 30 years. This puts greater volumes of water into the ground at one time than has previously been the norm. This is a real danger to the stability of the cliffs and accelerating coastal erosion. In 2004 one of the reasons that planning permission was refused on this site was because of the danger of flooding during a 30 year storm. This portion of the coast is not in the area scheduled for protection in the Shoreline Management Plan. The Plan itself is working on models for sea level rise which are already being superseded and it would be unwise to build anything new so close to the coast. Any development here should not go ahead without substantial investment in coastal defences, or including the section of the coast between Cromer and East Runton into the existing Shoreline Management Plan.
DS3	C10/1	B, Mansell (1218558)	LP822	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: •In the summer time it takes a considerable time to get out to the Runton Road. This will obviously increase if this proposed building development goes ahead.</p> <ul style="list-style-type: none"> The proposed Primary School will also increase this traffic onto the Runton Road. It appears the school will be on the apex of the hill which is bad enough now with cars parked on the verge restricting the width of the road. When parents start bringing or collecting their children from school this will be particularly dangerous area. There are several footpaths across this site which walkers use to avoid the traffic fumes from lorries, busses and cars using the busy Runton Road when walking to East or West Runton. It is a quiet and safe way to reach these villages. There should be a natural green belt between Cromer and East Runton otherwise it will end up with an urban sprawl and a loss of this countryside forever.
DS3	C10/1	Beall, Mrs V (1218467)	LP768	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I strongly oppose this site my reasons: being it is in an area of natural beauty used by so many locals and holiday makers. We have wildlife such as fox, muntjack deer, hedgehog (serious decline) plus many many more this is without insect life, and bees.</p>
DS3	C10/1	Benedettini, Mr Nathan (1217266)	LP310 LP312	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objection to proposed development of greenfield site adjacent to Clifton Park for housing and primary school. Plan identifies these facts: i) the area adjacent to Clifton Park is a greenfield site; ii) it is adjacent to a recognised Area of Outstanding Natural Beauty; iii) there is a need to retain existing green spaces. Yet the plan contradicts itself inasmuch as it proposes to develop this greenfield site for housing needs and a primary school. Many consider this site part of the wider local area of natural beauty. Many people (in the summer this can be in excess of one hundred people daily) use this land for walking, dog walking and exercise. Provides accessible green space away from car and noise pollution, surrounded by plants and wildlife. Provides a means of access between Cromer and East Runton that avoids having to walk along roads and inhale car fumes. Important as the coastal path is not available to walk directly due to holiday parks, i.e. to walk the coastal route requires walking along the road</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>in part at least. Used by wide range of wildlife including hedgehogs, deer, foxes, birds and amphibians. Improves well-being and manage the stress of daily living. MIND's report on ecotherapy; identifies the benefits to mental wellbeing from being able to taking walks outdoors, the benefits to services of such activities as limiting the need and demand on local primary care services and wellbeing services. This will create an urban sprawl from Cromer into East Runton, removing their separate identities as towns and villages, placing ever-increasing demands on already over-stretched infrastructure, and changing the uniqueness and appeal of Cromer's identity itself. It states that the Education Authority has indicated that the levels of housing proposed in Cromer will necessitate the provision of a new Primary School. There is no current need for a new primary school - the need is created by the proposed housing development. This is where the plan is flawed. It focuses on developing Cromer as a large town in contradiction to identifying the need to maintain and protect Cromer's natural beauty. As the town is developed, it will lose that identity which is its unique draw. The town relies on tourism and its appeal is its identity as a quintessential English seaside town that has not been subject to overdevelopment as other towns. It has a uniqueness, for instance, the local shops are not chain-stores as in other English towns. As a large town; will attract national/international chains to compete for local shopping development. This development would place further demands on local infrastructure that are operating at or above capacity already, such as the local water and drainage facilities, the coastal road through East Runton that is often blocked due to its narrow width, the Cromer one-way system that is at standstill at certain points each day, and the local GP surgery at Cromer where it is difficult to get urgent appointments due to staffing despite its recent expansion. Proposed expansion of Cromer is at a time when there are calls to take a stand for the planet and curb climate change. The plan does not benefit the local environment. It is proposed to meet national guidance on housing need. This government is going to change soon. Its priorities will change. And a key change will be greater focus on our climate. NNDC need to take a stand and do what is right for the environment. Do not need more housing and a school. Need to protect what we have and limit exploitation of the natural environment that locally we treasure, and which itself is the draw of the North Norfolk coast to tourists. Must protect green spaces at all cost to limit the impact of climate change, to maintain local ecosystems, and maintain this area as a beacon for outstanding natural beauty.</p>
DS3	C10/1	Benedettini, Mrs Jean (1218429)	LP809	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I note the proposed site is also outside the catchment area for Cromer Group Practice. Some species are already endangered such as the native hedgehogs that are seen on this land.</p>
DS3	C10/1	Benson, Mr Roger (1216144)	LP167	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to infilling between the two settlements. Cause significant traffic congestion in Cromer and East Runton. It is unsustainable in transport terms the development will change the character and views from and to the AONB which is close to the site and looks over it towards the sea. Will remove the one last bit of gap between the settlements and make this part of the AONB into a land locked area without views to the sea which aren't over a vast suburban sprawl. Affect numbers of way and public open spaces (such as Inceborough Hill) which will have their views of the Coast. The development is neither needed nor sustainable - it will not supply the social housing which Cromer needs</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS3	C10/1	Bridgman, Mr Chris (1216497)	LP195	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to the inclusion of this piece of Land in East Runton Land is in East Runton -it should not even be being considered. Would close the gap between Cromer and East Runton (which will be detrimental to the tourist trade which keeps the shops open in East Runton). Contrary to the NNDC stated aim of ensuring that different settlements are kept separate and would spoil the village location of East Runton. Sites R07 and C24 (within 30 yards) have been rejected because they spoil the surrounding countryside. This is inconsistent. In the 1960s it was ruled that this was an important piece of land in maintaining the character of the settlements of Cromer and East Runton especially with the prominent housing at Wyndham Park. Rejected in the past due to proximity to the Treatment works which is under an abatement notice at the moment. It is not suitable for housing. Not clear who is intending to pay for these properties as it seems unlikely that anyone would wish to spend money to buy properties with an immediate view of the treatment works. The Treatment works cannot cope with what it is asked to do now, and there are problems with smells - why build next to a known public nuisance? Rejected in the past due to proximity to the railway line. This has not changed and it is not a suitable location for a school. No mention made of the Bridle Path across the site which has to be maintained. Only two footpaths are mentioned whereas there are five in regular use. Mill Lane is a narrow road and not suitable for access to a school. No potential to widen it or put in pavements. Dangerous for infant children to be walking to school this way even with their parents. It is important to maintain the whole of this area as an entrance to Cromer not just the bottom part of the field. No proper plan for traffic management. The coast road is already busy especially during the summer. Appears to have been submitted in order to obtain planning permission only - the school and self build housing being the carrots. After that any builder could apply to vary. The land is outside the development boundary of the town.
DS3	C10/1	Bridgman, Mrs Margaret (1216419)	LP192	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to the inclusion of this piece of land which is in East Runton. The land is not in Cromer - It is in East Runton which is not indicated in the plan – therefore there should be no building here. Important in providing a distinct gap between Cromer and East Runton. Development would erode the distinction between the two. East Runton is a rural village and wish to maintain this and not become another Suffield Park. Quotes 11.10 BP 7. The importance of this land in providing a gap was stated in the ruling in the sixties which pointed to the proximity of the houses at Wyndham Park which would mean that any building would destroy the obvious separation of the two settlements. East Runton relies heavily on tourism. Has a unique mix of rural and seaside setting and the prospect of coming to something which is just part of a larger resort is a completely different experience which could have an adverse effect on trade. 2003, Council rejected building on this land because of the proximity of the Treatment Works and the Railway Line. The Treatment works has an abatement order on it at the moment. It is unsuitable to deliberately place housing and a school next to a known public nuisance. The proximity of the railway line makes it unsuitable for the location for a school Increase in traffic on the A149 which is already very busy during the summer months. Mill Lane is not suitable for an increase in traffic taking people to their houses or to and from the infant school. It is a country lane without pavements. Children walking along it on their own would be in danger. No scope to widen the road so that pavements could be introduced. The treatment works cannot cope with the sewage during the summer now and is ill prepared for an increase in the number of users. No coherent plan to deal with the extra traffic that will be

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					generated other than to say that the site is within walking distance of Cromer Station. Risks changing the entire character of the area and entirely spoiling the rural nature of East Runton. Does not bring sufficient benefits to justify the risk.
DS3	C10/1	Britton, Rev Tim (1210259)	LP095	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: That the land at Runton Road/ Clifton Park should be removed from the local plan. 1)Provides a gap between the settlements of Cromer and East Runton. Policy ENV 1 states: 'Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance: ...2) gaps between settlements, and their landscape settings.' The development of this site would remove that gap, not protect or conserve it. It is undeliverable. a) If at least 2 of the 8 hectares is to be used for a school, that means only 6 hectares are available for housing, open space, and buffer zones north and south and along the existing footpaths. The land at Howards Hill coloured green is just over .2 hectares. Nearly the same amount of land is covered in woodland, which paragraph 8.31 states should either be retained or compensated for. The buffer zones are unspecified, but also reduce the amount of land available. Although 90 dwellings seems very low density per hectare, the shape of the site and the need for road access to the dwellings and the school means that where houses are built the density would have to be very much out of keeping with the surrounding area. b) The plan recognises the need for any developer to deal with rerouting the sewage pipes. It also recognises that Anglia Water would have to upgrade their treatment plant to cope with the increased need, and that any developer would have to mitigate exposure to smells. Residents bordering the site already suffer from exposure to smells at times; new houses on the site would be closer to the source so an upgrade would be essential. Would a developer commit to development before the upgrade happened and its effectiveness assessed? And would Anglia Water commit to an upgrade before the development was certain? It might be possible; but the risks make the deliverability far from certain. 3) The proposal for about 90 homes is unnecessary - despite the central government's plans. The need for new homes is to house the homeless and provide affordable homes within range of employment. Building homes to enable people to retire beside the seaside is not a priority, and Cromer is not the best place to provide homes within range of employment - unless there is a remarkable move to provide a lot of employment away from the big cities.
DS3	C10/1	Broome, Mr Trevor (1210902)	LP096	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Removal of this proposal from the Draft Plan . Sits outside the Cromer boundary and forms part of the Parish of East Runton forming a valuable green amenity and what is critically, a natural break between the village of East Runton and Cromer Town, in an area of natural beauty, with a pedestrian link along Mill Lane. Been the subject of several applications to develop for housing and has continually been rejected as an inappropriate site for this purpose, fully supported by the Runton Parish Council and NNDC, so why the change? Landscape is distinctive in its character; supports many forms of wild life and provides a haven for those living in the area and holidaymakers alike to walk their dogs and to enjoy the peace and tranquillity that this area provides. The site is totally inappropriate for a development of this magnitude and a school, as the adjoining road infrastructure cannot possibly support the amount of increased vehicle movements that will access the A149 from housing and school alike, along an already heavily congested route in and out of Cromer and East Runton, especially at holiday periods when traffic volumes are high and access to and from all the caravan sites along the Runton Road is required. Furthermore, with a single carriage way through the village of East

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					Runton, which creates a massive backlog of traffic through the summer months, safety of pedestrians and especially children is already of great concern and can only increase. Further concerns are the smells emanating from the AW Plant that adjoins this site and the noise from the railway along the Bittern Line, both occurring on a regular basis. What impact will this large development have upon our already stretched GP services, where patient numbers are already incredibly high and waiting time for appointments ever increasing.
DS3	C10/1	Brownsell, Mr Andrew (1209759)	LP008	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Jobs, houses, improved infrastructure required but not at expense of protecting Cromer's natural environment and communities way of life and health. • Vital that we protect and enhance Cromer's unique natural environment – green space and woodland must be protected – use of green spaces and woodland enhances people's wellbeing • Protect Cromer as an important tourist destination, by protecting and enhancing the natural, green and historic areas • homes and jobs are needed, but this should not be at the expense of current local communities' way of life • improved infrastructure for transport is needed, but this should not be at the expense of current local communities' environmental health (such as increased emissions) • increased emissions has negative effects on the fragile natural environment, such as Cromer's coastal area and cliffs – resulting in negative climate change effects such as coastal erosion
DS3	C10/1	Brownsell, Mrs Caroline (1216042)	LP153	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Raise objection to the proposed development at C10/1 No division between East Runton and Cromer. Totally destroy the beauty of the local coastal area which people from near and far enjoy. Please refuse this planning for future generations to enjoy.
DS3	C10/1	Burge, Ms Sue (1210530)	LP050	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: -Unsuitability of Mixed use Runton Road/Clifton Park land for building development. East Runton and Cromer are separate and provides land which enhances its attraction for tourists and locals. Important for birds and wildlife, a green area which attracts many people and adds to the Cromer cliff-front from an aesthetic point of view.- highways -an increase in traffic on a road which is already congested and which has three bus services running along it, all of which are likely to be delayed with an additional 100+ cars seeking access onto Runton Road/Coast Road. Buses are essential to reducing emissions and pollution and serve both tourists and the local community and support a significant non-car owning population. Additional negative emissions will be considerable and are likely to cause health problems.- are there enough jobs in Cromer to support such a development. If this new population need to travel distances to work then clearly roads will become congested at key times.- Converting empty houses/shops etc in town would help to provide central and attractive accommodation.
DS3	C10/1	Cahill, Mr Bernard (1215877)	LP136	Object	to object to the proposal at C10 (land at Runton road/Clifton park) because this is one of the last greenfield sites of this size available to the local population as an open space for recreational purposes e.g. jogging, dog-walking, exercising and rambling . This plot of land lays in the village of East Runton and must not be annexed to a Cromer proposal. The document states that the Education Authority would prefer this site in order to serve the runtons area but i find this justification far too flimsy for such an important piece of property. This section of land is traversed by two paths that extend throughout the site together with a further path (north/south) that are used by many people for social purposes but also to avoid the main roads to Cromer

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					and East Runton. The erection of 90 additional houses in this area will result in additional security fears for Anglian water and the Railway authority in addition to a steep escalation in the number of complaints to the local authority about the fowl odours from Anglia Water, given the prevailing winds. 90 dwellings could be accommodated in 3 or 4 blocks of apartments on the brownfield site at Runton road near shipden Avenue.
DS3	C10/1	Cole, Mr Geoffrey (1215904)	LP134	Object	<p>Removal of this site from the proposals being considered for development for the reasons given ~This land is in East Runton and not Cromer, and provides the gap between Cromer and East Runton. The development of this site would remove this gap.</p> <p>~The land currently provides a valuable green amenity and a natural break between the village of East Runton and Cromer in an area of outstanding natural beauty.</p> <p>~I note the wording 'approximately 90 dwellings' - whereas documentation from the Planning Policy & Built Heritage Working Party of 21st May states a consideration suitable for 90-120 dwellings and a primary school - is this the correct figure?</p> <p>~I believe that this land is covered by 'half year rights' - and therefore cannot be built upon without the risk of litigation</p> <p>~There are already concerns about traffic volume which is high especially during holiday periods. This type of development will only exacerbate the situation and cause even greater backlogs of traffic through the village of East Runton increasing the safety concerns of pedestrians and especially children.</p> <p>~Are you wanting to discourage tourism to the area - as this will certainly have a detrimental effect on this...</p> <p>~This site is an important asset to local people and visitors who regularly walk there and enjoy the open space it provides</p> <p>~The site is an important resource for migratory birds which nest and feed on the land, and has become a wildlife sanctuary for rabbits, deers, foxes, lizards, grass snakes, bats and butterflies. The land also has an abundance of plant life - some of which are also becoming rare.</p> <p>~The document states a requirement by central government to build a certain number of houses - however, I am aware that this number has been downgraded</p> <p>~it is unwise to build so close to the coast with the known rise in sea levels and the danger of flooding and ongoing current concerns about the stability of the cliffs opposite this site.</p>
DS3	C10/1	Cole, Mrs Teresa (1209821)	LP013	Object	<p>Removal of this site from your listing of proposed developments. ~This land forms the critical gap between East Runton and Cromer. As this land (Muckle Hill) is in East Runton doesn't that mean that under the 'Settlement Hierarchy' this land should only be considered for small scale developments? ~Development of this land would have a negative effect on the quality of the landscape by reducing the rural character leading into East Runton Village, and there is a great need to protect the natural beauty and character of this area.</p> <p>~There is concern that services will not be available to support the planned housing developments .</p> <p>~I have real concerns about the increased risk of surface water flooding to the area once this becomes a housing development and the risk of surface water flooding to the adjoining surrounding areas.</p> <p>~It will not be a pleasant walking journey to any school on the site and I am sure many children will be brought to school by cars via the already congested town and village roads.</p> <p>~Road safety will definitely be an issue as there will be a definite increase in the volume of traffic not only through the town to access the school, but in general.</p>

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					<p>~Do you really want children to be playing in an open space next to a railway line amidst the chemical output from the treatment works? This plant can be very noisy – is running 24 hours a day – and produces some unpleasant odours which have a direct output to Muckle Hill.</p> <p>~The landscape at Muckle Hill is quite distinctive in character consisting mainly of bushes, and grasslands with natural footfall pathways throughout - and supports a variety of animals and wildlife. The loss of this natural habitat is of concern.</p> <p>~This land is special to the community providing a tranquil natural resource, rich in wildlife which does not have to be accessed 'out of town'</p>
DS3	C10/1	Cooper, Mr & Mrs Sheila & John (1218417)	LP732	Object	<p>~it would a great shame and very short sighted of the council to include this last remaining piece of green land in the development plan to be built on. It would trigger the urban sprawl along the coast road joining East Runton to Cromer and increase the amount of traffic using the A149 coast Road which is almost to capacity most of the time already</p> <p>~Can the Doctors schools Hospital and the AWA sewage plant cope with the influx of people.</p> <p>~We lived on Clifton Park for many years and the odour from the AWA sewage plant was for most of the holiday season unbearable we were unable to use the garden and had to close all the windows.</p> <p>~This piece of land is full of wildlife all of which would lose their habitat.</p> <p>~Many dog walkers use the fields, if they were built on these people Would be road walking or getting their cars out to go elsewhere.</p> <p>~Building homes and a school near a railway line is not the best idea kids will try to play on the railway however high you put the fence.</p> <p>~There is a bridle way across the land and a lane which goes from Cromer to Runton they would have to remain.</p> <p>~With the climate changing and the seas getting higher and stormed predicted to be more violent the Runton Road car park may not be there for ever, this is the only open land left on the coast.</p>
DS3	C10/1	Crisp, Mr Geoffrey Crisp, Mr Geoffrey Crisp, Mrs Helen (1215929 1215929 1215913)	LP138 LP740 LP151	Object Object	<p>Make a nature conservation area.</p> <p>~I do not approve of the proposed development plans for the land referred to as "at Runton Road/Clifton Park".</p> <p>~The loss of yet more green space that is constantly used by locals and visitors. The Runton Road field is by far more a car park than an open recreational area.</p> <p>~The loss of habitat for wildlife and birds such as the Skylark (they nest on the ground in that field), Woodpeckers, Thrushes, Whitethroats and other Warblers and many other little birds that are on the RSPB red list. Muntjac deer also inhabit the field.</p> <p>~The effect on holiday makers who will no longer have lovely views from the camp sites on Sandy Lane looking out towards the sea and for the visitors in the caravan parks looking out onto a lovely green space. Both will look either over or at houses. Not the views they spend their money every year to see. Hardly fair to jeopardise the very income the town relies so heavily on.</p> <p>~The ability of the sewer farm to cope with yet more sewage. I would expect the council to conduct a full and very, very, very thorough investigation as to the ability of the present farm to cope with yet more washing machines, baths, showers, toilets etc. pumping into its system. this is next to the Cromer sewage treatment</p>

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					<p>plant, this plant has a history of being both noisy and smelly at times and lorries coming and going at all times of day and night. I would not build houses or a school on this land.</p> <p>~Access to the site is concerning too. Where will the access be Will it be off the Runton Road, or via Fulcher Avenue or will it be via Clifton Park. Clifton Park is already an much busier road with lots of traffic using it as a short cut to Morrisons.</p> <p>~What of our local families on Cromer's housing waiting list. Will any social housing be offered to them</p> <p>~Light Pollution. Another very sensitive issue these days. There is already so much light coming from caravan parks up and down the road that nighttime hardly ever happens.</p> <p>~it is very important to keep this green space between Cromer and East Runton. I think its important to locals and visitors alike. And important to East Runton too. It would be a dreadful shame if East Runton became a suburb of Cromer.</p> <p>~It is a very diverse little patch of land which could even be made into a nature reserve</p> <p>~The development of this land is unnecessary The development of 90 properties and a primary school is not viable. There is not enough room The development of 90 properties and a primary school is unnecessary</p>
DS3	C10/1	Cullen, Miss Margaret (1215682)	LP140	Object	<p>remove c10/1 from plan push any new housing inland in less prominent sites.</p> <p>~no housing/schools on what's left of our beautiful coastal strip.</p> <p>~No to C10/1. A green and natural area for quiet and peaceful recreation by residents and holidaymakers alike.</p> <p>~The view from the train as it comes around the curve into Cromer looks right down this shallow valley and out to sea. It is uplifting and glorious for all our visitors and a wonderful welcome to our town.</p> <p>~If is it necessary for more houses do it inland where it will not impact on the very reasons why people want to be here in the first place.</p> <p>"remove c10/1 from plan push any new housing inland in less prominent sites"</p>
DS3	C10/1	Cullen, Mr Chris (1216505)	LP197	Object	<p>Preserve the Runton Road/Clifton Park area.</p> <p>~It seems ironic that at the same time the people of Cromer are fighting for better mental health services for the area, there is the threat of taking away aspects of the locality that aid the community's well-being e.g. walking in green spaces, connecting with nature.</p> <p>~Environmentally, bringing people to an area where employment opportunities are scarce can only mean more road use.</p> <p>~East Runton will effectively become a suburb of Cromer if this development proceeds, which will kill the village atmosphere. "Preserve the Runton Road/Clifton Park area."</p>
DS3	C10/1	Cushion, Mr Brian (1210093)	LP030	Object	<p>Removal of site from the Local Plan.</p> <p>~Consider this site has too many disadvantages to be considered as an appropriate development area of this nature.</p> <p>~the site is not adjacent to Runton Road, Cromer. It is on Cromer Road, East Runton and wholly within the parish of Runton. This misleading naming can only be an attempt to deceive local residents.</p> <p>~It is understood that Primary Schools in Cromer are under subscribed, and given the proposals for considerable development off the Norwich Road, it would seen more appropriate to consider further spaces for that scenario.</p>

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					<p>~The site is currently open space of a scrubby grassland nature, but serves as an important buffer between Clifton Park and more intensively used land in East Runton. It has become an area for regular dog walkers and any development would also destroy any ecological elements which must have accrued since its change from agricultural land as seen on 1988 Air Photographs.</p> <p>~It is rather grotesque that as the existing Clifton Road development provides a harsh edge to the urban area, it is in Runton parish that it is proposed to alleviate this by a carbuncle-like development.</p> <p>~This proposal would easily be a precedent for further linear development along the A149.</p> <p>~The suggestion that the development should be set back from the Sewage Works, whilst superficially obvious, does not detract from the fact that undesirable smells that emanate from it, do extend well into the site with the prevailing wind. Any further development of the facility is likely to further exacerbate this situation.</p> <p>~I would submit that you are deliberately underplaying the "limited constraints" on the site.</p> <p>~No mention is made of the obvious increase in traffic along an already heavily over-used A149, especially in East Runton, hardly an encouragement for sustainability.</p> <p>"Removal of site from the Local Plan. The only acceptable option would be a low-key i.e., undeveloped open space."</p>
DS3	C10/1	Duncan, Mr Phillip (1217309)	LP427	Object	<p>1. Selection of this site goes against the long held desire to maintain an undeveloped gap between Cromer and E. & W. Runton – this is ignored in the Conclusion. 2. A school in this location would confirm and compound the joining of Cromer with East Runton 3. The site is currently a valued space for informal recreation 4. The conclusion suggests The site scores positively in the Sustainability Appraisal. This statement applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. Furthermore, the summary assessment in the SA is inconsistent – see detailed comments on SA. 5. The conclusion suggests "This is considered to be one of the most sustainable and suitable of the Cromer alternatives". There is no evidence for this conclusion, particularly as it is noted as not being in walking distance of schools and has risk of flooding.</p>
DS3	C10/1	Edmonds, Mr Philip (1218478)	LP788,	Object	<p>Keep as open space corridor</p> <p>This area east Runton NOT suitable development. No increase capacity Anglian Water Sewage Plant. No detailed environmental survey this site e.g. Rare Sandy Heath between Coast and ESKER. Entrances to site unlikely to be sanctioned Norfolk Highways – The A149 should not have to cope with a school esp 'primary' and houses This area south of the A149 will no longer be available for caravan sites to the north of A149 have missed something large number houses built Northrepps / towards Roughton why build a school other side of town. Site to be left as heathland/natural area/civic amenity.</p>
DS3	C10/1	Empson, Mr & Ms Michael & Isabel (1218559)	LP823	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. We, the undersigned, used to live, a very few years ago, at Howards Hill West and Howards Hill Close, respectively. We know that the late Mr Clifton intended, but never did, build on the land adjacent to Clifton Park. Which land we believe, is actually in the Parish of East Runton. It had crops grown on it at one time, and we know that it is now mess. (It needs the Bagot goats on it!) WE ARE AGAINST BUILDING HOUSES ON IT BECAUSE IT WOULD JOIN CROMER TO EAST RUNTON. At the moment it is a green space between the two. Also building a Primary School on the very steep land by the Railway line, where there is a look-out defence Bunker left from the War, is to us not a</p>

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					good idea at all. We have often walked the footpath adjacent to the Old Zoo Site and the footpath that runs along the bottom of that land, on the edge of the Railway Embankment, has never felt safe. We would think a School on that bit of land would have to be built on stilts. We understand that only a few of the Clifton Park Residents received an informal plan of what it proposed. We also understand that you may not have had a formal planning application, but WE ARE DEFINITELY NOT IN FAVOUR
DS3	C10/1	Fleming, Mr Thomas, Fleming Mrs Hazel. (1215937, 1210090, 1218382, 1217356)	LP145, LP028, LP774, LP339	Object Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY.</p> <p>Site to be left as heathland/natural area/civic amenity.</p> <ul style="list-style-type: none"> • The proposal is located within close proximity to the water treatment plant and is a source of bad smells. The issue has been noted but Anglian Water would be required to remedy the situation. • Priority should be the development of the old Structure Flex site, to the east of Clifton Park. This is a brownfield site, the development of which would probably involve the removal of contaminated land, but would be easier and preferable to the work needing to be done on the proposed site. • Support the existence of an unofficial green belt between Cromer and East Runton, to preserve the identity of East Runton village and to provide a distinct boundary to Cromer town. • Although the proposed site has good links to the bus and train network, we believe that a development here would adversely affect the traffic density along the A149 and Clifton Park/Howards Hill/Central Road, creating a “rat run” along these roads which were never intended for such traffic density. Previous housing developments have been to the south of the town. Placing a school here to the west of the town would increase the already often gridlocked traffic flow through the town several times a day. Further the roads and train track do not provide a safe environment for children. • We question whether the government is wise to try to push so much new building onto an area which has few employment opportunities and slow communications to Norwich and beyond. The councils can build all the houses they wish, but if people don't want to move here for work then they are creating problems for themselves as the majority of incomers will be retirees who will put additional pressure on our GPs, hospitals and social services. Please note that the properties on the Parkview development are not selling. • Although we have a brand new GP surgery, it has not attracted medical staff to come and work here and the practice is still understaffed. An increase in population will make matters worse. Also, the one NHS dental practice in Cromer is full and the waiting list for this practice was closed over a year ago and is still currently not taking new patients or allowing them to register on a waiting list. Mobile phone reception in this area is patchy. Also fibre broadband is currently at full capacity, with no sign of new high speed fibre junction boxes being installed in the near future. • Many of the residents of Clifton Park were attracted to the area because it was on the edge of town with easy access to the countryside. One of the selling points of North Norfolk is its attractive towns and villages, and access to the beach and countryside is an important factor for health and wellbeing. A number of residents would seriously consider moving away if this access is made more difficult. The properties in Clifton Park are mainly inhabited by retired people. It is a quiet residential area. The building work will cause noise and disruption for a prolonged period of time. Once building work has been completed, the traffic flow along Runton Road and Clifton Park/Howards Hill will be greatly increased. This will lead to increased pollution and noise. The site itself increases the biodiversity of the area, being an area of heathland which provides a

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					<p>habitat for many species of birds, animals and insects. Skylarks, newts and bats have been noted there in the past.</p> <ul style="list-style-type: none"> • The site is enjoyed an amenity by dog walkers who enjoy the paths around the site, and for those living or camping nearby who wish to walk north to the coast or south to the Co-Op and other retail outlets on Middlebrook Way. • Loss of wildlife habitat, green space, trees and general rural outlook. Although this area is scrubland, it is an important wildlife habitat and green space. There are also many trees here. This area is also well used by dog walkers and holidaymakers from the caravan parks. I would like to see this area retained as a designated wildlife area. Loss of pleasant outlook for the caravan sites and potential loss of tourism. The caravan sites will look onto a housing estate instead of a green space. • Danger of flood risk and cliff erosion. • This portion of the coast is not in the area scheduled for protection in the Shoretime Management Plan. The Plan itself is working on models for sea level rise which are already being superseded and it would be unwise to build anything new so close to the coasts. Any development here should not go ahead without substantial investment in coastal defences. • There are very few full-time employment opportunities in Cromer and the surrounding area. Any work available is seasonal. • Is there a need for more housing in Cromer?
DS3	C10/1	Goodliff, C (1218421)	LP744	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The land has been used for a long time as a kind of common by local people. It is a community asset where residents meet each other regularly and where they take strolls several times a day, with or without their dogs. It is an asset not only for people who live here all year around, but also for many people from the adjacent caravan parks. The climate often makes walking impossible along the coast because of high winds; and it is at times like this that people need to resort to a place that is more protected, but open (so as to avoid being hit by branches). Particularly for the elderly residents the area is a great asset, as they often cannot embark on longer walks on one of the footpaths. It is also one of the few areas where dog owners can safely let their dogs off the leash. In short, it would be a great loss of the community living here, if the site were developed.</p>
DS3	C10/1	Hall, Mrs Zoe (1218468)	LP769	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly object to this proposal. I walk here with my dogs, as do other people. It is a beautiful natural area with many types of wild flowers and birds. There are a lot of bushes and undergrowth for small mammals to live and for birds to nest in. Far from being a building site it should be an Area of Outstanding Natural Beauty. Would be detrimental to Cromer to have a large estate here. Would possibly mean 180 cars. Access to this site would be solely from the east/west Runtun Road; only on route in and out. Main road and town is already congested enough, especially at Carnival time. There would be more pollution. I do not think that every pocket of land between small towns should be developed. We need open spaces. Even large towns have parks. Visitors come to this coast is because of the natural beauty. Opposites this field is a holiday park. Their outlook would be spoilt. The town benefits from and relies on visitors. Lot of people come to Cromer because it is not over-populated or built up. We should preserve the coastal area. P.S. I forgot to mention facilities for Doctors and Schools.</p>

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DS3	C10/1	Han Harrold, Mrs Sau (1218405)	LP797	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: See rep ID P780 above . Plus additional comments: • Building on Greenfield Land when a more appropriate Brownfield site is available nearby – the old Structure Flex site. • Building beyond the existing built up area of Cromer • East Runton should be preserved, as this is very important to their respective identities. • The Plan acknowledges that the existing infrastructure is inadequate for the increased population and that a new Primary School will be required. I contend that this inadequacy of infrastructure could also encompass medical facilities (GP’s, hospitals), social services and roads. • Currently a well utilised public open space enjoyed by many including dog walkers and bird watchers from Clifton Park and further afield. • Provision of public open space is essential for the health and well-being of the existing population. • Development of this scale would destroy this area of open space and not leave any meaningful spaces for enjoyment of nature. • Open land at Howards Hill is inadequate as it is inaccessible expect for one narrow path. • Dwellings should be for local people only to avoid an unmanageable population increase. • Two footpaths crossing through a housing estate do not compensate for the loss of a large area of natural habitat. • any “areas of scrub and grassland” retained will be so small as to be rendered meaningless. • The AONB will be adversely affected, there is a rich variety of bird and animal here including Kestrels, owls and woodpeckers. • Expensive mistake to build school and housing close to Water Recycling Centre: Health issues and potential lawsuits, could be a breach to duty of care. • Enhancements to the foul sewage network will be expensive and ultimately may still be inadequate.
DS3	C10/1	Hawkes, Mrs Victoria (1217707)	LP664	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Removal of this site from the draft local plan. Would be a tragedy to lose yet another piece of grass and scrubland which is enjoyed by many people who walk their dogs or use the footpaths both locals and visitors. The land is natural vegetation that flourishes unchecked providing a wonderful habitat for many species of wildlife. Crossing this corridor of land when walking between Cromer and East Runton is much more attractive than using the concrete footpath that runs by the very busy coast road where there is constant traffic. The intrusion development would spoil the feeling of leaving the town behind and being in the countryside by effectively joining Cromer with East Runton. “research showed a two-hour dose of nature a week – spending time in parks, woodland or on the beach – significantly boosts health and wellbeing” and “powerful healing qualities” of being in a natural setting, “We are increasingly finding that the richness in biodiversity of a setting seems to be important’ This is particularly pertinent when there is so much focus on mental health and wellbeing. The creep of houses and a school on this richly diverse piece of land would be totally detrimental to the amenities that this land provides.
DS3	C10/1	Hill, Mrs Janet (1216125)	LP164	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This development is inappropriate in this location. Generate a colossal amount of traffic through the Town of Cromer and village area of East Runton (as all traffic will enter and exit the site via the Coast Road) - both these areas are beyond capacity for the road network to cope with and frequently become significant ‘jams’. Development is unsustainable in transport terms The development will have a significant adverse impact on the AONB as although it is located just outside the boundary of the AONB, the rising land to the south and west is crossed by numbers of public rights of way and public open spaces (such as Inleborough Hill) which will have their views of the Coast - which is the characteristic defining element of the AONB - substantially adversely impacted by the development of this one remaining open green view of the coast The development will significantly harm the

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					individual characters of the settlements of Cromer and East Runton and make for a large ribbon of coastal sprawl development. The development is neither needed nor sustainable.
DS3	C10/1	Hoad, Mr David (1215907)	LP152	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The removal of C10/1 from the draft plan. A School in a residential area populated by predominantly retired residents is inappropriate. Further the surrounding road system would not support this. In order to fill the School, would need to attract pupils from outside the catchment area thus resulting in more traffic through an often grid locked town centre, along the already overstretched A149, or via Central road/Howards Hill/Clifton Park. The boundary between these 2(3) roads is a narrow, dangerous blind summit. - Access from the two spurs off Clifton Park to any development would prove inadequate for two way traffic, since any further residential development would also result in more traffic. -Junction of Clifton Park with the A149 is effectively a cross road with the existing caravan site. Clearly any additional turning traffic would prove an increased hazard to all. * Presence of the ‘unofficial’ green belt between E. Runton and Cromer maintains their separate identities. Such a loss would constitute urban sprawl and at the following considerable cost:-Loss of a varied and established wildlife habitat. - Provides access to the shoreline and beach by residents and neighbouring caravan & camping site users, walkers and cyclists as part of a healthy open environment leading to a sense of well-being. - further development would result in an increase in the volume of water running into an unstable cliff top. In the light of inevitable climatic changes and lacking further investment in sea defences, this could lead to disastrous consequences in the future.
DS3	C10/1	Hodges, Mrs Janet (1218470)	LP779	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I walk over there bird watching, to see the butterflies and wild flowers. It’s a beautiful quiet place in which to spend time. Please keep it as such. New Zealand are very strict on coastal planning because it destroys the environment. With all the worry of global warming we all have to preserve the wildlife that we have, especially England because it is getting so urban. Friends come here on holiday because of the tranquillity of our area, and the natural beauty. It would totally destroy Cromer to have a building project at the side of the town which would almost link with the lovely village of East Runton. Bearing in mind the pollution angle to have ninety houses would mean so many more cars which would impact of the infrastructure of the town, which is at full capacity now! This main road is already busy enough, but during the summer months and at carnival time it is impossible. Parking is at a premium in the town already. Cromer as a lovely holiday destination. We must maintain our Blue Flag status by restricting more building.
DS3	C10/1	Horsley, Mrs Anna-lise (1216400)	LP190	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I strongly object for these reasons: The government has declared a Climate Emergency. Piece of land is an essential "lung" and green buffer between Cromer and East Runton and is part of an important wild life corridor and vital for nature conservation. The site joins on to an "aonb". Building on this site would spread light, noise and other pollution to the AONB. Traffic would increase and road safety would be affected. Cromer does not have a bypass so the increase in traffic would be dreadful. This site is one of the reasons why people visit Cromer for its unspoilt rural areas, walking, cycling and enjoying nature. To obliterate this large area of natural habitat would be a tragedy. Are there sufficient jobs for all these new residents? The GP practice in Cromer (the ONLY one) is already overstretched. How would the health needs of all these people be met? The houses on this site would be for sale. Cromer needs affordable rentable housing. As jobs in this area are mostly in the low paid service sector

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					many people simply won't be able to afford even the deposit required for a mortgage. Many affordable rentable flats could be created above the shops etc. in Cromer town centre. This site would lead to even more house building or other land use encroaching on to Howards hill. The green area on the plan which incorporates a large area of established trees, ferns, wildflowers and bushes overlooking the railway embankment. Yet more of the essential "lung" could be cut away and destroyed. If all the planned new houses are really needed, there are large fields just outside Cromer where nature has already been pushed out. The topography could allow buildings to be below most sight-lines. Surely these would be more suitable for building land.
DS3	C10/1	Jamieson, Ms SallyAnne (1219330)	LP825	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: You only need to cross Runton Road and there's the start of several lovely walks. Exercise my dog on this piece of land. It is absolutely beautiful in its own right, there's lots of wildflowers and it is a proper English meadow. Building on this site is very short-sighted – being so close to the sea and holiday accommodation, it has to be regarded as a valuable asset for Cromer's lifeblood tourist industry. Honestly, if this wonderful site is going to be built up, I don't think I'll be spending my future holidays in Cromer. And that goes for a lot of other people in the Wyndham site too. Please protect this beautiful and valuable natural asset.
DS3	C10/1	King, Mr David (1209787)	LP137	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Remove C10/1 as a preferred site. C10/1 is an area used by both wildlife and humans alike. An abundance of wildlife can be seen of varying types and sizes on any given visit to this space, similarly, people of all ages and abilities can be found here also. There are no other spaces with such a unique blend of offerings to be found anywhere else within the vicinity. The proposed development will completely remove this space from the landscape, having detrimental outcomes for both the wildlife and local residents. This space currently provides a clear distinction and separation between Cromer and East Runton; in fact, the path along Mill lane is used extensively by both locals and holidaymakers to explore and connect the two locations. This proposed development will effectively join East Runton with Cromer, something that I do not believe has been requested. The addition of the proposed residential homes will bring with them additional vehicles, requiring access to and from the 'estate'. This access would almost certainly be from the coast road, an already busy area at the best of times and even busier during the infamous Cromer Carnival week. This additional traffic would certainly cause havoc on the coast road for locals; visitors and public transport.
DS3	C10/1	King, Mrs Sarah (1215908)	LP135	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Remove C10/1 as a preferred site. If this proposed site were to be implemented then the loss of wildlife habitat would be a devastating loss to the coastal area. There are many species of wildlife which inhabit this area, some of which are rare in the united kingdom. I would propose that a full ecological survey be carried out on all of the species in this designated area before the actual impact of implementing this proposal can be truly considered. This proposal effectively removes the demarcation between East Runton and Cromer meaning that they merge into one much larger area, I feel that this is not a positive step. It will create a loss of identity between the two places and that would be a real shame. The only access to this site would be from the main coast road, this would create a potential for accidents and also put pedestrians at risk. The footpath along this stretch of road between East Runton and Cromer is already well used, an increase in emerging traffic from the proposed development would add significant risk to both pedestrians and emerging vehicles. I also feel that a 2 form entry school

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					would not provide a significant offering to the primary school provision within the area, pupils would not have sufficient time at a provision of this nature before needing to move up the school ladder. They would be far better served to begin the school journey at somewhere they can carry on attending throughout the whole of the primary timeline.
DS3	C10/1	Langbourne, A (1218422)	LP745	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Local people need this space. I am disabled and cannot go far, and to take a stroll along the cliff path in Cromer is too far for me (and others like me); also, it is too built up and often far too crowded with visitors. This is the only area I can go to feel I am close to nature and listen to birds. Also, I would have to give my dog into a shelter if this land were taken away from people living here.
DS3	C10/1	Leigh, Mr Chris (1216481)	LP194	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Leave the green area around Clifton Park undisturbed for future generations. NNDC claim to have agreed that there is a 'climate emergency' and immediate action is required for the sake of future generations. One of these actions must surely be to limit to an absolute minimum the destruction of what little 'green' land is left, such as that at Clifton Park. If more homes are really required then an analysis of the number of empty properties/second homes etc. should be undertaken with the view to making these available to satisfy such requirements.
DS3	C10/1	Mallin, Dr Christine (1217441)	LP534	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: For this land to be protected and preserved as an area of natural beauty. The removal of it as a site allocated for development in the Local Plan. Extremely concerned about proposed development for the following reasons: (i) it forms a natural break between the settlements of Cromer town and East Runton village avoiding urban sprawl. This break helps retain the distinct character of Cromer town and East Runton village. (ii) the site is located within the Coastal Shelf as defined in the LCA and is adjacent to the AONB. Furthermore the site helps provide a further barrier between the coast and inland. (iii) loss of natural habitat for various species of mammals, birds and insects including bats, lizards, deer, foxes, etc. and various birds including birds of prey (such as buzzards and kites). (iv) detrimental impact on flora and fauna, for example, many wildflowers can be observed. (v) loss of the amenity value of this beautiful area which is enjoyed by local residents and tourists alike. The loss of such a beautiful place would have an immediate impact on those living nearby and also on those visiting it, both tourists who bring valuable economic benefits to the town and to local people who recognise its unique character and visit it on a regular basis to enjoy the peaceful environment which it provides. Green spaces where people can walk and enjoy nature are increasingly seen as essential to good mental and physical health and to lose this area would impact negatively on many people. (vi) infrastructure concerns which include - increased traffic in the area should the development go ahead and resultant safety concerns with a potential increase in road accidents - the impact on GP services which are already under heavy pressure- the presence of the sewerage works
DS3	C10/1	Miss Roisin Dunne (1217322)	LP327	Object	Preserve the land. This land is priceless to the town of Cromer. By building upon this land, the natural and authentic essence of Cromer will be lost. It is this that makes Cromer so appealing to tourists and by building on this land, tourism will be dramatically affected which East Runton and Cromer both heavily rely on. This land also creates a distinction between Cromer and East Runton, and by approving these plans both towns will combine into one huge estate which is sure to turn tourists away. Most importantly, Cromer already

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					struggles with traffic and congestion during peak times of the year and it is simply not big enough to allow for a whole new estate to add to these congestion issues. Once this land is lost, it can never be replaced. The preservation of this land is vital to this area and to see it destroyed would negatively impact the surrounding community. There are plenty of other places inland which would be much more suitable.
DS3	C10/1	Mr Martin Bailey (1217357)	LP338	Object	There should be no housing development on this particular site. This small remnant of natural landscape is the last survivor of a once beautiful landscape to the west of Cromer, before the advent of large-scale developments resulting in sprawling suburbia with indifferent architecture and hundreds of holiday homes to the north of the A149. Whilst Cromer is fortunate in being able to offer its visitors splendid beaches, access to the countryside remains poor, although several well-known long-distance footpaths originate in town. The site at Clifton Park/ Runton Road is the starting point for several walks, and has the potential to be much more than it currently is: a somewhat neglected site (neglected by local government), overrun with brambles and one dilapidated structure on its north-east border, where vagrants stay overnight and much rubbish has accumulated over the years. In spite of this state of affairs, the place is much-loved by residents; it is constantly in use by bird watchers, dog walkers, people with prams and children, and visitors from the adjacent holiday home park. The local flora, thriving on the acid sandy soils of this area, provides perfect habitats for a range of rare and endangered species of birds. As the site has been left uncut it provides a plentiful supply of seeds for many species, and the thick thorny nesting cover of the hedges, in particular the blackthorn, bramble and gorse, have up to now ensured that many species have survived in this small area – species that cannot survive in the large-scale industrial farming operations found around Cromer, or in the thinning (not well-maintained) hedges along public footpaths. Many of the birds found at the site are indeed on the RSPB's 'red' species list of conservation importance and are protected under the Wildlife and Countryside Act 1981: the linnets, sky lark, song and mistle thrush, starling, sparrow are all common sights on this land destined for development. As with all coastal developments nowadays, most of the planned dwellings will in all likelihood be grabbed by second home owners; they won't be permanently used, and so won't be of any benefit to the local community, let alone play any part in solving the housing crisis. On the other hand, removing this last vestige of landscape will result in the removal of a long list of species from the Cromer landscapes. It will also result in the disappearance of a much-loved and much-used asset for local people.
DS3	C10/1	Mr Tony Dyball (1218474)	LP784	Object	I would like to protest against the use of this land for building yet more homes in and around Cromer. This area is a very important piece of land regarding wild life and flowers, etc. I understand there will be up to 90 houses being built on this small area. This would very likely mean 100-150 cars trying to force their way on to the coastal road, which I do not think is acceptable. Could you please give details of how much money out of this deal between the Council, the land owner and the builder will be allocated towards the infrastructure of Cromer to accommodate possible upwards of 200 adults and children. The new surgery is already struggling and Cromer School classrooms are full to capacity, so I assume you will be designating some of that land for a new school and surgery, or will you be building them somewhere else? Not only do I think you should not be allocating this very important piece of natural beauty for building purposes, but Cromer has not got the facilities to accommodate another 90 more homes close to the centre of town.

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DS3	C10/1	O'Shea, Mr Anthony (1217311)	LP323	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The area designated c10/1 should be left as an open space. Object on the grounds of over development on the coast road spoiling an area of outstanding beauty. This proposal would link up Cromer and E. Runton ,ribbon development along the coast as can be seen on our own south coast. Want this remaining green area to be preserved it should never have been put forward as a site for development. If necessary the council should purchase the land for the community.
DS3	C10/1	Pettit, miss claire (1215847)	LP332	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: For the land at Runton Road /Clifton Park be removed from the first draft local plan. For Cromer to lose this special site which provides a natural boundary between it and the village of East Runton would be detrimental in many ways a) loss of an important green space which has been used and enjoyed for years by local and holidaymakers for a variety of uses. Many use it to walk their dogs, as I have done for the last 9 years, it is crossed by several footpaths/rights of way. Green spaces like this are becoming scarce now so this one should be protected and cherished for future generations. It is rich in birds (we have recorded 74 different species), many of which nest here , and wildlife abounds including rare plants such as orchids. Trees + shrubs including elm,walnut, wild damson and sloes. Even wild strawberries grow too . b) To build on this land would pretty much join Cromer to E.Runton. Do we want a coastal sprawl ? c) The water treatment works on the boundary can be noisy and smelly at times d) Raised land in the middle of site provides a viewpoint across the sea and area, also people who arrive by train see the Cromer view not houses ! e) Brownfield sites / infill sites could be used for extra housing without encroaching on the green spaces (When its gone , its too late) f) The old Jewsons site E of Clifton Park, Old doctors surgery site Overstrand Road are examples.
DS3	C10/1	Rahner, Ms (Dr) Chris (1217315)	LP324	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: No housing to be planned for this site. It is a sad fact that in the past, such developments have been given the go-ahead so that at the present moment, only a small strip of natural landscape has survived between Cromer and the plots of land already used or earmarked for further caravan/ camping sites that one passes before reaching East Runton. In addition, on the north side of the road, a mass of 'holiday homes' already covers the landscape. It is hoped, that this precedent is not going to work in favour of, but against the planned 90 dwellings. For several decades, this land has served the surrounding community well, by providing a safe green space for children to be close to nature (as opposed to parks), for the elderly to have a stroll and a place where residents can relax and meet their neighbours. In addition, it has provided the last refuge for many native species of birds (currently 31, according to current surveys sponsored by the NWT (Norfolk Wildlife Trust)), after the adjacent land to the west of it was allowed to be cleared and tarmacked for yet another caravan site. The land is also crossed by public footpaths catering to the ever increasing type of visitor who seeks to spend time in nature and to walk through an attractive countryside. Already many of the long-distance paths are marred by urban/ suburban sections or caravan sites, and they tend to start further and further away from the centre of the holiday resort, necessitating some visitors to use their cars rather than walk to the start of the footpaths. In view of this trend, 'Cromer welcomes walkers' - the official invitation as one drives into the town - is in danger of acquiring a hollow ring. Will Cromer's 'huge panoramas of land..' - as eulogised by the Walk Cromer initiative (https://walkcromer.co.uk) - turn into a coastal sprawl, one town merging with another (as will be the case with Cromer and East Runton if the plan goes ahead)? Cromer is well on the way of concreting over its natural – and therefore also economical - assets. It is hoped that in this instance, common sense will prevail

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					and that the plan to develop the site will be rejected. In addition, the Highway Authority indicated that 'localised highway network improvements associated with each of the proposals will be required' (12.9). Indeed, to service 90 more households, the coastal road would need widening with access points to the new development – which will hardly be consistent with the proclaimed intent to protect the AONB surrounding the town. Even if built, such a road would not be able to cope with the additional traffic generated by yet more development. As a final point, I would like to draw attention to point 12.9 of the Local Plan which states 'There is a general need to improve open space provision including new allotments together with improved access to the countryside'. In my opinion, this site might fulfil to a limited degree, such a requirement. Almost limitless car parking is available across the road, and there are several routes from the town centre to the site. There is no doubt that some gentle 'improvement' of the site in consultation with nature/ wildlife trusts would greatly enhance it for both wildlife and the public, whilst the strip of land adjacent to the coastal road could be reallocated for allotments.
DS3	C10/1	Ratcliffe, Mr Kenneth Shaw, Mr & Mrs (1218399 1218587)	LP796 LP793	Object Object	Also the habitats of thousands of insects and hundreds of other small animals will be disturbed.
DS3	C10/1	Salsbury, Mr Steven Salsbury, Mrs Jill (1210394 1217378)	LP083 LP367	Object Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to C10, which is unsuitable because: <ul style="list-style-type: none"> • it will practically merge East Runton with Cromer having a negative impact on both. • The area, with tracks crisscrossing it, is extensively used by dog walkers, walkers and joggers. It provides a pleasant rural walk to and from East Runton. • it is an important wildlife habitat. - it will increase pressure on services • it will increase the volume of traffic which both Cromer and East Runton would have difficulty in coping with. In East Runton, for example, the coast road is narrow and is a single lane at one point, and is certainly not suited for any increase in traffic. • more noise and pollution. Particularly felt by the Clifton Park residents. Houses there are built to optimise the sea views. The proposed development would not only spoil there view, but the new houses would be overlooked and have no privacy. • loss of scenic beauty. • Replacing this valuable green space with 90 houses and a school would have a dramatic negative visual impact.
DS3	C10/1	Sanders, Ms A (1217671)	LP661	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Consider upgrading the site to a major tourist asset. Pleasant access to several footpaths linking Cromer and the villages to the west of it. Cromer seems to be changing, and not for the better. As a town mainly known as a holiday destination, it is doing very little to make it more attractive to visitors. The only focus seems to be on the beaches. Cromer's weather makes it unpleasant to be by the beach/cliff and dangerous to be in a wood - necessary to offer open countryside attractions inland, within easy walking distance and not along roads! C10 is where one can take a stroll even in a gale. It is a beautiful wild space with a ready-made wildflower meadow where a large number of different species grow without interference by or cost to the Council. A bit of management (e.g. curbing the bramble thickets) would result in creating a major wildlife attraction. Whilst 'open spaces' are supposed to be planned for the housing development, these would invariably be urban, and so much the poorer for it. We hear on a daily basis that children should be encouraged to explore nature, but we seem to be doing the opposite, making it ever more difficult for children to find out about it. This piece of neglected land supports wild lupines, dog rose, yarrow, several species of cranesbill, tormentil, stitchwort, birds' foot

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					trefoil, sheep sorrel, cats-ear, etc.etc, not to mention masses of blackthorn which is magic in the spring with its profuse blossoms and which is inhabited by several blackcaps and whitethroat families. It is in fact surprising that these two species are found so close to human habitation. To destroy all this in order to cover it in houses (some of which will inevitably be second homes, or retirement homes for people who do not actually need accommodation in Cromer) would be very sad.
DS3	C10/1	Sault, Mrs Kathryn (1209781)	LP776	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Also the habitats of thousands of insects and hundreds of other small animals will be disturbed
DS3	C10/1	Saunders, Mr Richard (1215911)	LP149	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly oppose the proposed development on land at Runton Road/Clifton Park and this should be removed from consultation. This proposed development would seriously impact on the health and well-being of the local and tourist community. It is a haven for wildlife and bird life , providing walks accessing the coast and countryside as well as routes to local shops. The area is used by dog walkers, tourists from the caravan parks and the local community. The water treatment plant is in close proximity to the proposed development and the strong smells emitted from this plant are not conducive to building new homes in the vicinity. The boundaries separating the settlements of Cromer and East Runton would be redefined and potentially be a threat to urban sprawl. The volume of local traffic would increase along the Runton Road and Howard’s Hill and with an increase in pedestrian activity during the tourist season this could culminate in an issue of road safety. The pressures on infrastructure would be greater with the risk that the local GP surgery and dental surgeries would be unable to cope with the demand.
DS3	C10/1	Saunders, Mrs Susan (1210010)	LP019	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object strongly to the proposed development. Loss of open space. The site is important to the local landscape, local community,tourists,dog walkers and walkers and the proposed development would result in the loss of open space which is important for its recreational use, rural character and appearance. Threat to wildlife and natural beauty. The local biodiversity would be affected by this proposal. Many species of bird life are prolific in this area including Kestrels, buzzards, sparrowhawks as well as wildlife such as deers and pipistrelle bats whose habitat is possibly in the barn situated on the proposed site. Urban sprawl. The communities of Cromer and East Runton would merge threatening the character and identity of the two settlements. Visual impact. Clifton Park commands an elevated position designed to optimise panoramic sea views for its residents. The majority of properties situated on the perimeter have Juliet balconies, decking and summer houses erected for the purpose of enjoying the environment. The proposed development would be overlooked and privacy for the site would be compromised. Volume of traffic. The number of vehicles accessing Howard’s Hill, Clifton Park and Runton Road would significantly increase and during the tourist season the safety of pedestrians would pose a risk from the increase in vehicular activity using the road network. Infrastructure. An increased demand for the provision of local health care from GP and dental surgeries must be taken into consideration as a rise in population asks the question as to whether these services will be sustainable in the future.
DS3	C10/1	Shillcock, Mrs Susan (1210562)	LP063	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Oppose the proposed development, this piece of land to be protected and preserved. All land is precious and all aspects of it should be very carefully considered before any irreparable damage is done. Once natural land is altered it is irreversible. The piece of

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					<p>land behind Clifton Park has a very short life span compared to land inland, due to erosion of the coastline, not in our lifetime or in the next generations but eventually it will be taken from us as nature will not adhere to our will or housing plans. What will then happen to these homes that people have invested in. More so the land is question is stunningly beautiful and uniquely diverse and deserves our unreserved protection. Our modern world is dominated by development and financial gain, however we are becoming increasingly aware of the damage we are doing to our planet and what we are denying future generations. This is a prime example of profit verses preservation. This habitat should be left undisturbed as it gives home to pheasants, monk jacks, birds, insects, caterpillars and many species of wild flowers. This is not just waste land, of which there are many areas that could be developed with out such losses to our environment. We would willingly accommodate any one from the council or planning to visit my property and see first hand the beauty of this land, not just to highlight the view that I could lose but to see how its destruction can be justified. The approach into Cromer is through villages and natural landscapes, if this land is lost it will completely change the entrance and first impressions of Cromer. These characteristics, charm, beauty and history should be treasured as it is these qualities that keep tourists and visitors returning to this town. Cromer is a quaint unspoilt seaside town and although that doesn't mean that it can't be touched by progress, Its main entrance road with stunning views should not be compromised and have to follow the development demand of other typical inland areas where the effects would be less catastrophic. There is a caravan site directly opposite. A tourist area should not look directly onto a housing estate. This is unfair to those who pay large site fees to come to a coastal location and away from what you find in a built up urban residential area. This piece of land is an asset to Cromer's tourism and the town as a whole. Cromer should be proud that it has kept its unspoilt identity and has not been spoiled like so many other seaside towns in the disguise of progress. Cromer's naturalness and self will to remain Cromer can not be underestimated and compared to other areas of the country. There has been significant housing development already in the area i.e. Holt, which has also now lost some of its unique charm and character and its surrounding area is now indistinguishable from anywhere else in the country. The Runton Road is not wide enough to take the extra traffic from 90 homes, this will also create dangerous driving conditions in Clifton Park, Howards Hill and Central Road where traffic is parked on both sides of the road. We strongly believe the proposed school will not actually take place and this is just a sweetener to get the plans passed. The school in Cromer has been sufficient for many years. If so then the extra traffic and need for parking would also adversely affect the surrounding area. The development if it takes place it more likely to attract out of the area buyers, so will not ease the housing shortage for locals. They will be used for second homes and will then remain empty for periods of time and won't be beneficial to the town or its economy. The sewage works is inadequate now, this will need vast amounts of investment and updating should it have to support this development, which will cause lots of lengthy disruption to the town as well as making this site not ideal to develop and for people to have to live near it. Is there not any way this land could be bought from the owners but made use of in its natural state and protected. This would keep the green belt area and clearly define the boundaries between Cromer and East Runton, which residents of both would want to protect. This would be able to then be enjoyed by the whole of Cromer not just the people who buy the new houses.</p>

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DS3	C10/1	Shillcock, Ms Rachel (1218547)	LP814	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site lies within the parish of East Runton. The previous Plan tried to designate this land for development, and that one of the reasons for rejecting it was the desire to prevent continuous development between Cromer and East Runton. I do not believe this development should take place for the reasons listed:</p> <ul style="list-style-type: none"> • The water treatment works south-west of the site is a source of bad smells. The proposal notes the problem, but we are aware that it will require extensive action on the part of Anglia Water to remedy the situation and increase the capacity of the plant to cope with such a development. Planning developments around such plants are known to be too sensitive to the local situation, especially when such planning involves residential housing and schools. • Priority should be for the development of the brownfield Former Structure Flex site, which would involve the removal of contaminated land. • Strongly support the existence of an (unofficial) green belt between Cromer and East Runton, to preserve the identity of East Runton and to provide a distinct boundary to Cromer town. • Although proposed site has good links to the bus and train network, development here would adversely affect the traffic density along the A149 and Clifton Park/Howards Hill/Central Road, creating a "Rat Run" along these roads which were never intended to cope with such traffic density. • Is the government wise to try to push so much new housing onto an area which has few employment opportunities, and slow communications to Norwich and beyond. The councils can build all the houses they wish, but if people don't want to move here for work then they are creating problems for themselves - the majority of incomers will be retirees who will put additional pressure on our GPs, hospitals and social services. • Although we have a brand new GP surgery, it has not attracted medical staff to come and work here and the practice is still understaffed. An increased population will make matters worse. • Many of the residents of Clifton Park were attracted to the area because it was on the edge of town, with easy access to the countryside. One of the selling points of North Norfolk is its attractive towns and villages, and access to beach and countryside is an important factor. We have spoken to a number residents who would seriously consider moving away if this access is made more difficult. • The site itself increases the biodiversity of the area, being an area of heathland which provides a habitat for many species of birds and animal. Skylarks and Newts have been noted there in the past. • The site is enjoyed by dog walkers who enjoy the paths around the site, and for those living or camping nearby who wish to walk north to the coast or south to the Co-op and other retail outlets on Middlebrook Way. • Previous housing developments have been to the South of the town. Placing a school on C10 to the West of the town would increase the already often gridlocked traffic flow through the town centre several times a day. • the housing and infrastructure is meant to withstand a "once in 30 years' storm. However, the impact of global warming seems to indicate (a) that these storms will become more severe and (b) that they will occur more frequently than every 30 years. This puts greater volumes of water into the ground at one time than has previously been the norm. This is a real danger to the stability of the cliffs. In 2004 one of the reasons

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					that planning permission was refused on this site was because of the danger of flooding during a 30 year storm. <ul style="list-style-type: none"> This portion of the coast is not in the area scheduled for protection in the Shoreline Management Plan. The Plan itself is working on models for sea level rise which are already being superseded and it would be unwise to build anything new so close to the coast. Any development here should not go ahead without substantial investment in coastal defences, or including the section of the coast between Cromer and East Runton into the existing Shoreline Management Plan.
DS3	C10/1	Simpson, Mrs Deborah (1218481)	LP742	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This site does not fall within Cromer Town boundaries but is in fact in East Runton. There is an existing green belt which should be retained to separate Cromer from East Runton. Development of that area would add to the existing problems with traffic along Runton Road and into the town centre as all the facilities such as drs. surgery / hospital / schools are all on the other side of the town centre. The area provides a social amenity at present. It is a pleasant area to walk in. It provides a short cut to Sandy lane / Holt Road and to East Runton. The benefits of open land and exercise are well documented. The problems with flooding near the main road and Clifton park point to an overworked drainage system which would be made worse by further development. There is a real risk of lack of stability in the nearby cliffs. I question the need for a new school when Cromer and Sheringham have falling numbers. In addition there is already spare capacity at Suffield Park Infant School due to a recent building programme. West Runton school children currently use Sheringham Community Primary School which is nearby.
DS3	C10/1	Smith, Mrs Amy (1217006)	LP250	Object	Object to the development of approximately 90 dwellings and a primary school on the site.
DS3	C10/1	Trott, Mrs Anne (1217376)	LP366	Object	The proposed development will destroy a valuable local asset and the proposals for this area of land should be removed. This area of land supports a wide variety of plants, animal and bird life. It is used for recreation by a variety of different people who walk and run across the network of well-established paths. As such it is a most valuable asset supporting the physical and mental well-being of the community. Its destruction would accelerate the decline of bio-diversity. Once assets like this are alienated they cannot be replaced.
DS3	C10/1	Vaton Mr W. Uddin. Turvey, Miss Lorraine. Trott, Mr Benjamin, Trott, Dr. Michael. Trimmer, Mrs Janice. Trimmer, Mr Mark. Trimmer, Mr Mark. Thomas, Mr Darren. Taylor, Ms Siri, Stowe, Mrs Bernice. Stow, Mr Paul	LP774, LP339, LP816, LP670, LP016, LP015, LP007, LP005, LP174, LP187, LP810,	Object Object Object Object Object Object Object Object Object Object Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. <ul style="list-style-type: none"> The proposal is located within close proximity to the water treatment plant and is a source of bad smells. The issue has been noted but Anglian Water would be required to remedy the situation. Priority should be the development of the old Structure Flex site, to the east of Clifton Park. This is a brownfield site, the development of which would probably involve the removal of contaminated land, but would be easier and preferable to the work needing to be done on the proposed site. Support the existence of an unofficial green belt between Cromer and East Runton, to preserve the identity of East Runton village and to provide a distinct boundary to Cromer town. Although the proposed site has good links to the bus and train network, we believe that a development here would adversely affect the traffic density along the A149 and Clifton Park/Howards Hill/Central Road, creating a “rat run” along these roads which were never intended for such traffic density. Previous housing developments have been to the south of the town. Placing a school here to the west of the town would

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
		Stevenson, Mrs Elizabeth (1218382, 1217356, 1210106, 1217834, 1209913, 1209733, 1209658, 1209658, 1216225, 1216252, 1216222, 1218610, 1218560)	LP811, LP824	Object Object	<p>increase the already often gridlocked traffic flow through the town several times a day. Further the roads and train track do not provide a safe environment for children.</p> <ul style="list-style-type: none"> • We question whether the government is wise to try to push so much new building onto an area which has few employment opportunities and slow communications to Norwich and beyond. The councils can build all the houses they wish, but if people don't want to move here for work then they are creating problems for themselves as the majority of incomers will be retirees who will put additional pressure on our GPs, hospitals and social services. Please note that the properties on the Parkview development are not selling. • Although we have a brand new GP surgery, it has not attracted medical staff to come and work here and the practice is still understaffed. An increase in population will make matters worse. Also, the one NHS dental practice in Cromer is full and the waiting list for this practice was closed over a year ago and is still currently not taking new patients or allowing them to register on a waiting list. Mobile phone reception in this area is patchy. Also fibre broadband is currently at full capacity, with no sign of new high speed fibre junction boxes being installed in the near future. • Many of the residents of Clifton Park were attracted to the area because it was on the edge of town with easy access to the countryside. One of the selling points of North Norfolk is its attractive towns and villages, and access to the beach and countryside is an important factor for health and wellbeing. A number of residents would seriously consider moving away if this access is made more difficult. The properties in Clifton Park are mainly inhabited by retired people. It is a quiet residential area. The building work will cause noise and disruption for a prolonged period of time. Once building work has been completed, the traffic flow along Runtun Road and Clifton Park/Howards Hill will be greatly increased. This will lead to increased pollution and noise. The site itself increases the biodiversity of the area, being an area of heathland which provides a habitat for many species of birds, animals and insects. Skylarks, newts and bats have been noted there in the past. • The site is enjoyed an amenity by dog walkers who enjoy the paths around the site, and for those living or camping nearby who wish to walk north to the coast or south to the Co-Op and other retail outlets on Middlebrook Way. • Loss of wildlife habitat, green space, trees and general rural outlook. Although this area is scrubland, it is an important wildlife habitat and green space. There are also many trees here. This area is also well used by dog walkers and holidaymakers from the caravan parks. I would like to see this area retained as a designated wildlife area. Loss of pleasant outlook for the caravan sites and potential loss of tourism. The caravan sites will look onto a housing estate instead of a green space. • Danger of flood risk and cliff erosion. • This portion of the coast is not in the area scheduled for protection in the Shoretime Management Plan. The Plan itself is working on models for sea level rise which are already being superseded and it would be unwise to build anything new so close to the coasts. Any development here should not go ahead without substantial investment in coastal defences. • There are very few full-time employment opportunities in Cromer and the surrounding area. Any work available is seasonal. • Is there a need for more housing in Cromer?

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS3	C10/1	Walsh, Mr John (1210621)	LP092	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objection to this site, an alternative should be found. Regardless of whether or not we do need this scale of housing in this region (where there has already been substantial development over the last decade). C10/1 is totally inappropriate for development for the following reasons: <ul style="list-style-type: none"> • It has not been used for any agricultural or commercial use in many decades. • The site is an important asset to local people and visitors who regularly walk there and enjoy the open space it provides – there are limited alternatives in the Cromer area. • This site acts as an important green belt separating Cromer from East Runton. • The loss of this space would promote the coalescence of Cromer and East Runton. • Development of the site would further suburbanise our coastal environment and degrade its seaside aspect which may deter summer visitors. • The site has become an important resource to resident and migratory birds many of which nest, shelter and feed there. Also a diverse array of wildlife depend on the site which includes lizards. Britain has recently been declared one of the worst countries in Europe for depletion of wildlife. • The site has developed a diverse plant community some of which are becoming rare in North Norfolk. • Building here will increase road traffic onto the already very busy A149 and into Cromer Town Centre which in turn will add to pollution and increase pressure for new roads. • The Council recently declared ‘a state of climate emergency’ but development on this scale is ignoring the spirit of that declaration. • It appears that every scrap of green space in the Cromer area is to be ‘infilled’ promoting further suburbanisation.
DS3	C10/1	Watts, Mrs Sally (1210021)	LP021	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Not suitable area. The time for using these locations for building home was forty years ago when there was the work for the people living in the area. The rising sea levels make both of these sites viable in the short term only. Given the rate that the cliffs are eroding to the North of both sites it could only be in a worst case scenario a matter of a few decades before any properties built were literally 'beach front properties'

Individuals	Number Received	Summary of Responses (Site Policy DS3)
Summary of Objections	91	Feedback focussed on concerns over development on land which is considered to be a crucial gap between East Runton and Cromer and the wish to retain the existing town and village boundaries. Several other reasons including concerns over the smells from the AW plant and noise from railway line as well as flood risk should there be heavy rainfall were also cited. A149 is very busy all year, and more so in Summer. Concern that Clifton Park, Howards Hill and Central Rd would become rat runs. Capacity concern at WRC and potential impact on services and the lack of employment opportunities in the area were also raised. A number claimed that a school is not required and that the 90 dwellings are unnecessary. Many are concerned with the impact development would have on wildlife and biodiversity including some endangered species, while also highlighting that the site is used for recreation. Some objected with regards to potential impact on amenity for the surrounding area. Safety concerns raised for children next to railway line and treatment works. Suggestions that brownfield sites should be given priority over this site including Former Structure Flex. One raises inconsistency with the assessment with sites R07 and C24 being rejected as they spoil surrounding countryside.
Summary of Support	0	None received

Summary of General Comments	3	Comments recognise that houses and jobs are needed, but should not be at expense of local communities' way of life. Need to protect and enhance Cromer's unique natural environment and protect green space, woodland and historic areas which enhances people's wellbeing and is important to tourism. Improved infrastructure for transport is needed, but this should not be at the expense of current local communities' environmental health, such as increased emissions which has negative effects on the natural environment, such as Cromer's coastal area and cliffs – resulting in negative climate change effects such as coastal erosion.
Overall Summary		Feedback focus on concerns over development on land which is considered to be a critical gap between East Runton and Cromer and wish to retain town and village boundaries. Several other reasons including concerns over the smells from AW plant and noise from railway line and flood risk should there be heavy rainfall. A149 is very busy all year, and more so in Summer. Concern that Clifton Park, Howards Hill and Central Rd would become rat runs. Capacity concern at WRC and potential impact on services and the lack of employment opportunities in the area. A number claim that a school is not required and 90 dwellings are unnecessary. Many are concerned about the loss of green open space which has a range of wildlife and biodiversity (including some endangered species) and is used regularly for recreation use which is important for people's wellbeing. Some object to the potential impact on amenity for the surrounding area. Safety concerns raised for children next to railway line and treatment works. Suggestions that brownfield sites should be given priority over this site including Former Structure Flex. One raises inconsistency with the assessment with sites R07 and C24 being rejected as they spoil surrounding countryside.
Council's Response		Noted. Consider comments in the development of the policy. Landscape and settlement considerations including the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published which has informed site selection. The Council has fully engaged with key service providers to identify the likely impacts of development and site specific requirements. This includes highways, water and sewerage. The Council continues to work with Anglian Water in order to identify site specific issues and who have subsequently recommended that an Odour Risk Assessment be undertaken in relation to this site to inform policy development on this site. The Council has used current evidence base and engaged with relevant bodies including Children's services to identify where additional supporting school infrastructure may be required as a result of new development in Cromer and they identify this site as its policy preference. It is recognised that there is a requirement for further ongoing dialogue to support any final policy position in order for the Council to fully commit to securing an education site through the Local Plan process. Concern is noted about potential flood risk and its implications - the Council has engaged fully with the Environment Agency and other relevant key professional bodies/persons - The site is located in Flood zone 1 - low probability. Concern is noted about the impact on biodiversity/wildlife. The Council will take into account consultation feedback from bodies such as Norfolk County Council, including the education authority, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and geodiversity and continue to work with site promoters to take into account biodiversity and geodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact identified.

DS4: Former Golf Practice Ground

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS4	C16	Watts, Mrs Sally (1210021)	LP021	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Not suitable area. The time for using these locations for building home was forty years ago when there was the work for the people living in the area. The rising sea levels make both of these sites viable in the short term only. Given the rate that the cliffs are eroding to the North of both sites it could only be in a worst case scenario a matter of a few decades before any properties built were literally 'beach front properties'
DS4	C16	Duncan, Mr Phillip (1218558)	LP430	Object	1. The walk to Roughton Rd train station appears outside what would be considered an easy walking distance. A measurement “as the crow flies” shows the site is c. 1.3 km distant and the actual walking route appears much greater than this. 2. Local knowledge describes this site as having unstable ground due to the presence of below ground water channels. 3. The Proximity to SAC and SSSI is “less than 400m”. Other sites are less than this. 4. The site is within both the AONB and the undeveloped coast: other sites not within undeveloped coast. 5. The conclusion suggests The site scores positively in the Sustainability Appraisal. This statement applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. Furthermore, the summary assessment in the SA is inconsistent – see detailed comments on SA. 6. The conclusion suggests “This is considered to be one of the most sustainable and suitable of the Cromer alternatives”. There is no evidence for this conclusion, particularly due to distances to train station and from SAC, risks of flooding and contamination.
DS4	C16	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports the proposed allocation and is committed to delivering a range of housing on the site addressing the recognised the quantitative and qualitative need within the borough and the settlement of Cromer. Landowner in advanced discussions with delivery partners who are committed to bring this site forward for development as soon as possible , with intention of new homes being delivered in the first few years post-adoption of the Local Plan. 3.24. The site is suitable and available for development, with single ownership and there are limited constraints, committed to development during the first years of the plan period.3.25. It is welcomed that that the policy provides a degree of flexibility over the number of dwellings that can be delivered on the site. 3.26. Further design and technical work is being undertaken but the site has the potential, subject to type of dwellings and density, to provide additional homes as it is not considered at this stage that there are any significant constraints to development of the site. 3.27. The site is located in a highly sustainable location, close to the Town Centre associated amenities and public transport. Sustainable development should be encouraged in such areas. 3.28. The site is large enough to vary densities to create different character areas. The need to provide particular tenures should not be included within the policy as an absolute requirement. It is a sound approach to allow an appropriate mix to come forward at the time of submission of an application in accordance with up to date market evidence.3.29. Total of 9 persons awaiting a self build plot; only one confirmed their preferred location as Cromer. The requirement to provide self build plots on site should therefore be based on demand at the time of submission of an application.3.30. As the site is not considered, in the supporting text, to be intrusive in the wider landscape, development should therefore be sustainably maximised alongside the introduction of appropriate new landscaping. 3.33. The SA has regard to the potential for likely significant environmental effects associated with the site’s development. The report identifies that the site scores positively as it is located edge of settlement with good access to local healthcare services, education facilities, peak time public transport links, leisure

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>and cultural opportunities and employment, in close proximity to the Town Centre. This confirms the site as a sustainable location for development.3.34. The only constraints, which can be overcome through on site mitigation readily are the site's potential negative biodiversity impact owing to its proximity to the coastline SSSI and SAC and a small proportion of the site being potentially susceptible to surface water flooding. Through careful layout, design and landscaping, these can be mitigated. Paper 4 confirms that other than potential foul sewerage capacity issues, specific infrastructure delivery is required in conjunction with the allocation of the site. The policy highlights that Anglian Water have advised that enhancements to the foul sewerage network capacity may be required before development can proceed. We request this be removed from the policy as foul sewerage capacity issues will be identified and addressed as necessary as part of an application submission. Paper 6 supports the site as a Preferred Option and summarises that it is suitable to be allocated for residential development for approximately 180 dwellings and that it is considered to be one of the most sustainable and suitable of the Cromer alternatives. SHMA This shows that Cromer is located in the Central Norfolk Strategic Housing Market Area. It supports the allocation of the site for housing.3.40. The HELAA identifies the site as a deliverable site which could accommodate a gross capacity of 252 units. The site is therefore, available, suitable and achievable within the early years of the plan period.3.41. The site is at the lowest risk of flooding from rivers. The site is therefore sequentially preferable to other sites where there is a greater probability of flooding.3.42. The SFRA identifies that a small part of the site, like many other sites across North Norfolk, is at some risk of ground and surface water flooding, but it is considered that this can be handled satisfactorily via detailed design. The site will include sustainable urban drainage to mitigate any potential risk.3.43. In accordance with proposed policy, the site will include sustainable urban drainage as appropriate. The site will be supported by a Flood Risk Assessment and Drainage Strategy at application stage. We therefore propose that the policy be re-worded to read as follows:</p> <p>"Land amounting to approximately 6.4 hectares is proposed to be allocated for residential development comprising approximately 180 dwellings which can include elderly person's accommodation, affordable homes and self-build plots, public open space, and associated on and off site infrastructure. Development proposals would need to comply with a number of policies elsewhere in this Plan and the following site specific requirements:</p> <ol style="list-style-type: none"> 1. Careful attention to site layout, building heights and materials in order to minimise the visual impact of development; 2. Provision of appropriate internal open space; 3. Retention and enhancement of hedgerows and trees (access permitting) around the site, including the protection of existing woodland within the site; and 4. Provision of a landscaped buffer along the northern and western boundaries
DS4	C16	Salsbury, Mr Steven Salsbury, Mrs Jill (1210394 1217378)	LP083 LP367	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: C16 is unsuitable, within the AONB, the AONB Partnership's vision stated that 'the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity..', yet these proposals will have an unacceptable impact on the natural environment and air quality. The volume of traffic generated would have difficulty being accommodated by the existing road network. I'm not convinced that there are enough job opportunities in Cromer. Many jobs are seasonal, so many residents would be travelling to other towns and Norwich for work. Large scale building work near the coast would cause the land to be more unstable, hastening erosion. The region, too, is traditionally drier than other parts of the UK, and with longer spells of dry weather already being experienced with climate change, water shortages could be a real problem.</p>

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Individuals	Number Received	Summary of Responses (Site Policy DS4)
Summary of Objections	3	Limited comments received. Members of the public raise concerns over the potential impact on the natural environment, water supply, air quality, road network and the AONB. The amount of employment opportunities in Cromer and the viability of this site considering rising sea levels and potential for coastal erosion.
Summary of Support	0	None received
Summary of General Comments	1	Support received from the landowner who confirms that the site is available, suitable and achievable and able to deliver housing within the first few years following the plan's adoption. Committed to delivering a range of housing on the site recognising the need within district and Cromer. Further design and technical work is being undertaken. Suggests that the requirement to provide self-build plots should be based on demand at the time of submission of an application.
Overall Summary		Limited response received. Some concerns over the potential impact on the natural environment, water supply, air quality, road network and the AONB. The amount of employment opportunities in Cromer and the viability of this site considering rising sea levels and potential for coastal erosion. Support received from the landowner who confirms that the site is available, suitable and achievable and able to deliver housing within the first few years following the plan's adoption. Committed to delivering a range of housing on the site recognising the need within district and Cromer. Further design and technical work is being undertaken. Suggests that the requirement to provide self-build plots should be based on demand at the time of submission of an application.
Council's Response		Noted. Consider comments in the finalisation of the Plan. Clarification on availability and further design and technical work being undertaken in welcomed. The Council has fully engaged with key service providers to identify the likely impacts of development for local highways and water. Comprehensive site assessment has been undertaken on all sites, covering but not limited to environmental impacts and highways impact. Further details are set out in published Background Paper 6. Assessment has been informed by site specific sustainability appraisal. The proposed allocation would need to comply with all relevant policies in the Local Plan in order to secure planning permission including but not limited to those on the natural environment and air quality. The Council has engaged fully with the Environment Agency and other relevant key professional bodies/persons. It has used the most up-to-date flood risk evidence base in order to identify the likely flood risk of sites. Mitigation measures will be a requirement to offset any potential adverse impact (for example the need for Sustainable Urban Drainage Systems). The site falls outside of the coastal erosion risk zone. The approach to self build and how the level of demand identified through the self build register (low) that relates to the potential provision will be reviewed as part of Policy HOU2

DS5: Land West of Pine Tree Farm

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS5	C22/1	Redmond, Mrs Erca (1216750)	LP230	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Preferably no new build or football pitches in chosen locations. From Christopher’s Close, access to the A149 is often difficult due to the volume of traffic coming into Cromer over the railway bridge, which is narrow and unsafe for pedestrians. Despite the speed restrictions, car and motorbikes speeding coming out of Cromer is very common. The traffic often builds and backs up in Norwich Road, indeed to outside Christopher’s Close. Have had delays getting to the boathouse and boat in water for 10 minutes from the emergency call despite us only being 1.25 miles from the boathouse/pier. Northrepps has a dark sky policy and the light pollution from the proposed football pitch lights which violate this. The area is a haven for wild life. Our water supply is often erratic or poor to non-existent during the busy times when the population is expanded due to tourists even without any extra houses. I understand the residents in Stephen’s Road suffer badly with this too. It is difficult to get a doctor’s or dentist appointment. The hospital waiting times for blood or X rays is unacceptably high with the current and no extra population. I understand the schools are full too. The town carparks are often full during peak tourist times. Preferably no new build or football pitches in chosen locations. If outline granted, Mini roundabouts at both the Christopher’s Close and Station Road access to Norwich Road. New access road to both main arteries to the town not just Norwich Road. An approach to the owners of cut through by the Zoo to make this an official route avoiding the town centre for use by locals. More car-parking, more schools and healthcare facilities. A full survey of water pressure, demand and infrastructure. More affordable housing, and rental choices for our young families and key workers. If allocation goes ahead then suggest that mini roundabouts are provided at Christopher’s Close and Station Road. New access road to both main arteries to the town not just Norwich Road. More car-parking, more schools and healthcare facilities. A full survey of water pressure, demand and infrastructure. More affordable housing, and rental choices for our young families and key workers. Why not look to the central parts of rural Cromer opposite Cromer Hall used as a campsite? This is closer to town and has lower use roads in and out without using the two main road arteries</p>
DS5	C22/1	Roper, Mr Ron (1218558)	LP762	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: C22/1 will have a severe environmental impact upon an AONB which has almost the same protection as a National Park and forms part of a natural green field boundary separating the parishes and falling into line with the council policy of maintaining a visible separation and protection on these, just as the coast road Cromer, Runton boundary and Cromer, Overstrand boundary, these green belts now form the majority of AONB left within the Cromer parish as much of this special allocation has already been lost due to encroaching development and continues to be eroded with camp sites, pick your own farms, temporary car parks, and boot fairs etc, This is also the breeding grounds of protected species such as brown hares, roe deer, barn owls, bats and honey buzzards as well as game birds breed for gun sport which bring in revenue to the area and it is also used for exercising dog’s with horses so all this would be jeopardised, and once lost cannot be replaced. The football pitches will be managed privately and it will be argued that to pay for their maintenance they will be used to the maximum permitted level causing noise and light pollution in an area covered by a dark sky policy adopted by the council to aid those of us in this area with observatory’s and telescopes and more disturbance and pressure on nearby protected species. These facility’s are not within Cromer will mean that the major way of access will be by car leading to more environmental damage, congestion and disturbance to a relatively quiet suburb of Cromer with mainly retired inhabitants occupying a majority of bungalows with few children in the vicinity. The amount of traffic created by this scheme would overload an already overburdened network as Cromer only has one through route with the</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					main shopping facility's on one side of the town which lead to heavily congested roads in summer with the added problem that Roughton Road and Hall road will be used as rat runs to avoid the Norwich road congestion. Roughton road is already reduced to a cart track in places due to the recent development's laying pipework and the continual disruption caused by heavy construction traffic over many years, this country road also has two pinch points at each there end making passing of large vehicles impossible and dangerous. There will be no footpath or cycle way connecting this development with the 3 parish's that it will be a part of thereby requiring pedestrians and cyclists to navigate an extremely busy road system. The BBC recently reported that these fringe development's place a dependence upon the owning a vehicle because of the lack of planning in providing shops, doctors, transport links, schools and other amenities needed in everyday life, thereby adding to further traffic problems in this area. This land is also prone to flooding as it is relatively flat with no run off possible other than through drainage via existing road networks. Other infrastructure effects associated with this will be water, gas, and sewage with also lower broad band speed, plus doctors and hospital appointments as these have also been effected by the recent development in Roughton Road so further development will obviously need to be addressed along with school uptake within the plans to allow for expansion and growth as these are not covered. One area which already suffers noise pollution is Cromer go cart track so maybe this would be a better location for the football pitches as it's close to a major trunk road surrounded by trees and most importantly away from housing.
DS5	C22/1	Watts, Mrs Sally (1210021)	LP021	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Not suitable area. Cromer just does not have the infrastructure in place or likely to be put in place to support the traffic, schooling or health needs of this amount of development. I would love to see local people being able to afford to purchase or rent a home in Cromer but this is not going to help anyone but those who want to see a profit.
DS5	C22/1	Salsbury, Mr Steven Salsbury, Mrs Jill (1210394 1217378)	LP083, LP367	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: C22/1 is unsuitable. within the AONB, the AONB Partnership's vision stated that 'the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity..', yet these proposals will have an unacceptable impact on the natural environment and air quality. The volume of traffic generated would have difficulty being accommodated by the existing road network. I'm not convinced that there are enough job opportunities in Cromer. Many jobs are seasonal, so many residents would be travelling to other towns and Norwich for work. Large scale building work near the coast would cause the land to be more unstable, hastening erosion. The region, too, is traditionally drier than other parts of the UK, and with longer spells of dry weather already being experienced with climate change, water shortages could be a real problem. Overall, the proposed developments will certainly not improve the quality of life, health and well-being of its residents, and at the same time make it less desirable as a holiday destination, which in turn would see a downturn in trade and business. These developments go completely against the Norfolk Planning Policy Framework which states that 'local plans should seek to conserve and enhance the natural and historic environment and promote healthy communities..'
DS5	C22/1	Gurrney, Mr & Mrs Simon & Deborah. Hill, Mr Iain Bidwells (Agent)	LP487, LP490	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whilst supportive of the principle of a residential led mixed use development in this location, we raise concerns regarding the deliverability of the proposed allocation. More specifically, whilst the policy makes it clear that any proposal must provide a means of access to the A149 by means of a roundabout, it is evident that, as drafted, the extent of the proposed allocation does not provide sufficient land to deliver the required infrastructure improvements. This is demonstrated by a recent letter from Norfolk County Council Highways in relation to planning application reference: 9/1/18/216, which proposes to develop the site in

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
		(1217428 1217161)			accordance with the general principles of draft Policy DS 5. The letter states that the County have fundamental concerns with the proposal and, as a result, has issued a holding objection. This is on the basis that, amongst other things, “the proposed footway widening at the east side of Norwich Road appears to require land that is outside the highway boundary and outside the land within the applicants control. Any off site works need to be deliverable within land which is either in control of the applicant or within the control of the highway authority.” It is, therefore, evident that in order to ensure that the proposed allocation can be considered deliverable and developable in accordance with the National Planning Policy Framework (NPPF), and therefore allocated in the Local Plan, the extent of the site needs to be extended to incorporate additional land; land that is within my client’s ownership.
DS5	C22/1	Duncan, Mr Phillip (1217309)	LP430	Object	1. Proposed use is described as “housing” yet the conclusion identifies it as preferred for sports pitches and facilities. There is no explanation or evidence for this. 2. Site is “considered unsuitable for development” yet is identified as a Preferred Option. Inconsistent and therefore unjustifiable as a Preferred Option. 3. No evidence for the statement “development on this site shouldn’t have a detrimental impact on the landscape and wider countryside”, particularly as it requires a footbridge and roundabout, and is “visible from the south and immediate surrounding area. 4. The topography of the site is not significantly different from the topography of other sites proposed. 5. Inconsistency in the description that the site has “no contamination issues” yet the SA records it has “potential for remediation of contamination” 6. The conclusion suggests The site scores positively in the Sustainability Appraisal. This statement applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. Furthermore, the summary assessment in the SA is inconsistent – see detailed comments on SA. 7. The conclusion suggests “This is considered to be one of the most sustainable and suitable of the Cromer alternatives”. There is no evidence for this conclusion, particularly as it is visible; requires construction of a new footbridge and a new roundabout in order to be considered suitable; and the presence of large mature trees along the road from which access is proposed and has risk of flooding.

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Individuals	Number Received	Summary of Responses (Site Policy DS5)
Summary of Objections	6	Concerns are expressed over this development; the potential impact on the natural environment, AONB, air quality, dark skies, noise and wildlife. Development would not improve quality of life, health and well-being of its residents and impact on trade and business, stating that it would go against the NPPF. Concerns over the increase of cars on the road network and pedestrian connectivity to the town centre. Flooding issues on the site and water shortages due to longer spells of dry weather from climate change. Issues with school, healthcare, water, gas, sewage, broadband capacity. Suggest that mini roundabouts should be provided at Christopher’s Close and Station Road and new access road to both main arteries to the town not just Norwich Rd. Request a survey of water pressure, demand and infrastructure. One is supportive of the principle of residential in this location but raises concerns over the deliverability, the site does not provide sufficient land to deliver the required infrastructure and the extent of the site needs to be extended to include additional land. One questions why the preferred site includes sports pitches and facilities but the site has been assessed for housing. Assessment states that the site is considered unsuitable for development. The landowner for alternative site C25 wishes the site to be considered as part of site DS5. Access issues can be addressed. One proposes new alternative site, closer to town and would not use two main road arteries.
Summary of Support	0	None received

Summary of General Comments	0	None received
Overall Summary		Feedback highlighted concerns on; the potential impact on the natural environment, AONB, air quality, dark skies, noise and wildlife and on the health and well-being of its residents and impact on trade and business. Flooding issues on the site and water shortages due to longer spells of dry weather from climate change. Request a survey of water pressure, demand and infrastructure. Concerns over the increase of cars on the road network and pedestrian connectivity to the town centre. Suggest that mini roundabouts should be provided at Christopher's Close and Station Road and new access road to both main arteries to the town not just Norwich Rd. Issues with school, healthcare, water, gas, sewage, broadband capacity. Limited support for the principle of residential in this location but raises concerns over the deliverability, the site does not provide sufficient land to deliver the required infrastructure and the extent of the site needs to be extended to include additional land.
Council's Response		Noted. Consider comments in the development the policy approach. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and continue to work with site promoters to take into account biodiversity features. The Council has fully engaged with key service providers to identify the likely impacts of development for local highways, water, and sewerage and energy networks. These issues have been taken into account in site assessment. The site is in Flood Zone 1 - low probability and Anglia water have indicated that off-site reinforcement may be required in relation to network capacity. The Council has engaged fully with the Environment Agency and other relevant key professional bodies/persons. The Council has engaged with Health and Education providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement to provide a footbridge or suitable alternative to provide pedestrian / cycle links to the town centre. The proposed allocation would need to comply with all relevant policies in the Local Plan in order to secure planning permission including but not limited to those on the natural environment, dark skies and air quality. Comments noted on deliverability and will be addressed in the next iterations of the plan.

Proposals for Fakenham

DS6: Land North of Rudham Stile Lane

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS6	F01/B	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS6)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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DS7: Land at Junction of A148 & B1146

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS7	F03	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS7)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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DS8: Land South of Barons Close

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS8	F10	Castleton, Mr Norman (1218485)	LP807	Object	Object to the development plans for the area marked policy SS8. The development would be destructive to the green environmental corridors that exist and make this part and much of Norfolk unique. Housing on this scale and in this area will destroy the natural habitats of flora and fauna. It is far too close to the River Wensum Area of Conservation.
DS8	F10	Barker, Mr John (1218558)	LP437	Object	This site is not suitable. Barons Hall Access impossible. •This is a school drop off road and accessibility in early mornings, midday and afternoons is limited. There have been numerous occasions when dangerous situations have occurred with children due to the building of 10 houses at the top of the road, this would be a lot worse if 55 houses were built. •The positioning of the site will lose forever the character of the area and should be retained as a wild life habitat
DS8	F10	Benson, Mr Roger (1216144)	LP674	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Remove this area from the Local Plan. Adversely impact on the wildlife value of the Wensum Valley by reducing the area of semi-natural habitat (pasture) and altering other areas of existing quiet habitat (wet woodland and pasture) to open access with unspecified alterations to their nature and composition. The Wensum Valley is one of the most important wildlife corridors and areas of linked protected wildlife sites in the County and this underpins and supports the River Wensum's status as an internationally important wildlife area designated as an SAC. The area has been under pressure from development in the Fakenham area for some years and this would significantly impact on the connectivity and cohesiveness of the 'corridor' through the Town. Tourism to the area is now largely based on the value of the wildlife sites in and near to the Town and this would be adversely affected by such a development which would damage the setting and appearance of the valley from key public rights of way. The EA have raised concerns over the impact of contaminated surface water from this site entering the Wensum area and this will lead to further problems
DS8	F10	Heard, Mr Arthur (1217337)	LP349	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The land is not suitable for residential housing 1. several occasions the area has flooded therefore it would not be suitable for housing. 2. The red area shown to the adjoining residential properties is not correct as we have plans from the Land Registry proving this. 3. The smell from the local animal incinerator plant could be an environmental issue.
DS8	F10	Hill, Mrs Janet (1216125)	LP321	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: F10 unsuitable for housing. The Wensum Valley as a whole is one of the most important wildlife sites in the County and has the highest protection for the River Wensum - to European level. The value of the Wensum as a SAC is largely predicated on the value of the wide area of surrounding linked habitats along the valley, some of which are also protected and some of which are not. However, without the linking and supporting areas of natural habitat such as this site, the more highly designated sites would not be able to support the diversity of wildlife that they do, and it is the scale, integrity and diversity of semi-natural habitats along this long corridor of the river valley - with the river at its centre - that makes the Wensum Valley so valuable to wildlife. Developments such as F10 would further fragment and disrupt the value of the existing remaining habitats in the Valley where it passes through Fakenham. There have already been significant fragmenting developments which have seen damage to both the value of the landscape and to wildlife and this would further add to it. From the text, it would appear that the development option sees the provision of the 'green' land as a positive enhancement to the ecology and wildlife of the area, by providing this as some sort of public open space. In reality this would seem to suggest that further disturbance and damage to the wildlife interest of the valley would be caused at a point where there is already good public access (which I use a lot), and where the few remaining 'quiet' areas for

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					wildlife to thrive and commute without human and domestic pet disturbance, are few. Therefore, far from being an advantage, the change in use of this area would actually detract from the biodiversity value of the Valley. Many people come to Fakenham for the tourism interest of the wildlife sites of Pensthorpe and Sculthorpe Moor, but they also stay in the area and walk in the valley outside these sites. It is vital for the viability and health of the tourism industry to value what remains of the wilder natural areas of Fakenham and not to further build on them. Visitors say that they feel that the Wensum in the Fakenham area is not as lovely as it used to be largely because of new developments such as that at Kinnerton, if we continue to damage it further, they simply wont come any more.
DS8	F10	Knight, Mr Martin (1217977)	LP673	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This development is seen as being unnecessary. Incredible, attractive, wildlife rich area existing so close to the town. The existence of conservation areas run by Pensthorpe Natural Park and the Hawk and Owl Trust to the west and to the east of the town provide a single, large linked habitat that is well placed to provide a valuable wildlife corridor as well as a valuable recreational resource. Lack of public access to some of these areas provide essential refuges for wildlife. This would be damaged if the development goes ahead. Have seen a wide range of wildlife occupying the area marked. Asked directions by three separate groups of tourists asking the way to the river. We are not against the development of Fakenham per se, for example, we understand the need for the northern development that is planned close to where we live. It is disheartening however, when we see so many people and organisations doing so much to protect this unique environment to realise that this area is under threat unnecessarily.
DS8	F10	Oglesby, Mrs Susan (1215855)	LP126	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site shown does not belong to one landowner and includes land that belongs to my Mother. Request that the plan is amended to remove land owned by my mother. There will be no development on her land. I am amazed that you would even consider building on a flood plain. The proposed development will be even lower than the existing properties in this area, which are already at risk of flooding. The sandbags, which are to be seen outside even the northern end of the Kinnerton factory when we have heavy rain in the winter, should indicate the risk of the proposed housing area flooding. The concreting over of a flood plain area/meadow also puts at risk existing properties further along the river. There is no shortage of alternative already agreed development land in Fakenham. This is taking unnecessary risk.
DS8	F10	Pope, Mr & Mrs G (1218477)	LP787	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1.The site is a flood plain to the river Wensum protecting existing property. 2. Barons Hall Lane is a Bridleway and not suitable for the heavy volume of traffic that this development would produce. 3. Heavy volumes of traffic in Barons Hall Lane during school start and finish times would present a serious hazard/ safety issue to children and parents. 4. The new properties already built in Barons Hall Lane when sold will present a serious safety risk as cars will be reversing into the flow of traffic both ways. 5. I am seriously concerned that the infrastructure will not be able to cope (Doctors Surgery, Schools, Sewerage and Utility Supplies) also with the increased road pollution. It was proposed that a development in the area of Rudham Stile Lane was built. This would have been a better development as there is the capacity for road improvements to provide access.
DS8	F10	Rumley, Mrs Barbara (1217787)	LP666	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objecting to this site for the following reasons: The Wensum valley pasture meadows are a very special habitat and need to be nurtured - the riverside walks are really special and enjoyed by many. Creating housing here would undoubtedly impact this - and it would take many years to recreate such habitats, if indeed it could be done. It also makes a nonsense of all the efforts to create conservation

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					areas and reserves in the meadows east and west of the town. It seems a very short-sighted policy/plan when the plans exist for development to the north on sites which are not so environmentally sensitive.
DS8	F10	Wilkins, Mr Robert (1217860)	LP671	Object	Object to this proposal. The site is in a flood plain area and is adjacent to an AONB. Such a development will increase the danger of flooding of the adjacent land which will have an adverse impact on the flora and fauna of the adjacent areas. It will also interrupt the movement of fauna along the Wensum valley which is a recognized area of environmental scientific interest. It was understood that there would be no further extension of the Valley Way development. Bearing in mind that there are over 700 houses planned for a site off Rudham Stile Lane I question that Fakenham can manage to cope with the additional pressures that will be placed on schools, traffic, medical facilities etc. It is unlikely that much further employment will be available in Fakenham. Therefore people will be commuting to other towns which will not provide any economic benefit to the town.
DS8	F10	Wilson, Mr James (1218028)	LP676	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Delete from the preferred sites The development will damage the cohesiveness of the semi-natural land in the Wensum Valley and therefore have impacts on Protected Species and the special qualities of the River Wensum SAC/ nearby CWS and SSSIs and will therefore reduce the biodiversity value and habitat value of the Valley by reducing the areas that can be used by wildlife. This is contrary to Policy ENV 2 (so the site is actually contrary to other stated aims in the same plan) The site will have severely damaging effects on the local landscape character of the area by removing an attractive area of grazing within the Valley and introducing a hard built element which is alien to the semi-natural environment of this part of the valley floor. This will be particularly visible from the footpath along the northern side of the site and the riverside path along the Wensum. This damage cannot be mitigated by landscaping in this valley landscape context regardless of statements to the contrary in the Local Plan text as this will remove the spacious but semi-enclosed character of the remaining meadow in this location. The site cannot therefore be said to be ‘sustainable’ which is a principle guiding aim of all planning policy as underpinned by the NPPF document. For the above reasons the development will damage the tourism economy of the area by reducing the number of people who will want to visit and stay in Fakenham which is now becoming a centre for nature conservation tourism through the linked sites along the Wensum Valley including the Hawk and Owl Trust site at Sculthorpe and Pensthorpe Natural Park but also particularly the access to the valley from Public rights of way along and near the river in Fakenham. - Why damage one of the main jewels in the crown of Fakenham and damage sites further away as well? Overall there will be significant detrimental impacts to the Character and biodiversity of the area and that these impacts will have a bad effect on the way in which Fakenham is seen and used by tourists. There are much better and more sustainable locations for housing development elsewhere around the boundaries of Fakenham which will not have these damaging effects
DS8	F10	Spowage, Mr Richard (1217394)	LP424	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: • Increase run off into the adjacent floodplain • Could have an impact upon the Wensum Flood Plain – this can have an impact upon both farming and upon tourism activities • Highlights that the area is at risk of flooding adjacent to the development site factoring in 40% climate change. • Damage to this area could have detrimental effects to the local wildlife of the valley
DS8	F10	Mr Kevin Doy (1216261)	LP182	Object	Refuse development in this location and keep as natural habitat. We have been witnesses of the massive biodiversity and impact of rising water levels to this location for the last 33 years so speak from experience and have collected a wealth of photographic evidence to reinforce our opinions that this land is totally unsuitable for any form of Residential / Commercial development Both Areas identified F10 are subject to flooding - 29/12/2017 Green area we

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					have photographic evidence of entire area under approx. 600mm of water depth, Red Area shown in photographs with large size deposits of water that were then here for several weeks due to continuous downpours Current location F10 Red highlighted abundant with wildlife, historic hunting ground (documented) for Family of Barn Owls, Buzzard, Red Kite., Bats. Other visitors are Roe Deer, Frogs and Toads, Fox and Otter Run off water from Barons Close area is deposited into historic soakaway in middle of field identified in Red F10 The development is in direct contradiction of NNDC Local Validation Protected species Checklist Points 4, 5,8,10 and 11 and BS42020:2013 Any proposed development will damage the Cohesiveness of this semi-natural land in the Wensum Valley and therefore have a negative impact on the protected species and the unique special qualities of the River Wensum Special Area of conversation / nearby County Wildlife sites and SSSI's . It would be incredulous to suggest that the concreting over of this site would not severely diminish the Biodiversity value and habitat value of the valley that has been sympathetically maintained and allowed to develop by generations of landowners. The destruction of this jewel of Fakenham would be contrary to Policy ENV2 in the local plan. For these reasons , the site can never be 'Sustainable' which is a principle guiding aim of all planning policy as underpinned by the national Planning Policy Framework document Planning application on this site should be subject to increased public and Central Government Scrutiny due to possible conflict of interest that may have incidentally arisen due to conflict of interest and position of influence of landowning family with regards to planning and local government We have a catalogue of Chronological photographic evidence of this site to support our views which we will make available when requested
DS8	F10	Archson George (1210391)	LP043	Support	look forward to the housing development on F10 providing better access to the river. Despite there being a bridleway, this area is seldom seen by townfolk and its development would improve the town's amenities - something important given the size of the Northern Developments.

Individuals	Number Received	Summary of Responses (Site Policy DS8)
Summary of Objections	12	The responses primarily focus on concerns over the environmental impact of development; the importance of the site for wildlife and biodiversity acting as an important environmental corridor and likely adverse effect on SAC, county wildlife site and SSSI adjacent to site. The lack of public access to this area provides habitat for wildlife. Concerns over impact on local landscape character, which is considered cannot be mitigated by landscaping. Access problems; Baron Hall Lane unsuitable to deal with heavy volumes of traffic, especially at school drop off and pick up times. Could be flooding problems and problems with contaminated surface water entering the Wensum Area. Concern over lack of employment opportunities and additional pressure on infrastructure and services.
Summary of Support	1	One supports this proposal, on the basis of providing better access to the river and improving the town's amenities.
Summary of General Comments	1	Comment received stating that the land is not in one ownership and includes land that is unavailable for development. Raises concern that proposed development would be lower than the existing properties and therefore would be at a risk of flooding. Developing on the flood plain puts existing properties further along river at risk. No shortage of alternative land available in Fakenham.
Overall Summary		The responses primarily focused on concerns over the environmental impact of development; the importance of the site for wildlife and biodiversity acting as an important environmental corridor and the potential adverse effect on SAC, county wildlife site and SSSI adjacent to site. The lack of public access to this area provides habitat for wildlife. Concerns over impact on local landscape character, which is considered cannot

		<p>be mitigated by landscaping. Access problems; Baron Hall Lane unsuitable to deal with heavy volumes of traffic, especially at school drop off and pick up times. Could be flooding problems and problems with contaminated surface water entering the Wensum Area. Concern over lack of employment opportunities and additional pressure on infrastructure and services. One comments that the land is not in one ownership and includes land that is unavailable for development. One supports this proposal, providing better access to the river and improving the town's amenities.</p>
<p>Council's Response</p>		<p>Comments noted. Consider comments in the finalisation of the policy. Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape and views have been taken into account. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and continue to work with site promoters in the identification in relation to biodiversity. Mitigation measures will be a requirement to offset any potential adverse impact. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement to consider the relationship and impact on the environmental designations particularly the SSSI, and require a landscaped buffer to the south of the site with increased public access. The location of residential development is outside any identified Flood Risk. The Council has engaged fully with the Environment Agency and other relevant key professional bodies/persons. It has used the most up-to-date flood risk evidence base in order to identify the likely flood risk of all sites and inform distribution. Development proposals will be subject to a satisfactory Flood Risk assessment demonstrating how flood risk from all sources of potential flooding to the development itself and from the site to the surrounding area, will be taken into account managed. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements. Mitigation measures will be a requirement to offset any potential adverse impact. Further work on deliverability will be undertaken in the next iterations of the plan.</p>

Proposals for Holt

DS9: Land South of Beresford Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS9	H04	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS9)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

DS9/205

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DS10: Land North of Valley Lane

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS10	H17	Jones, Dr David (1210609)	LP074	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Oppose this proposal and favour an alternative site. H17 will have a significant impact on the local environment which is in 2 conservation areas. 27 dwellings represents fairly high density with associated noise levels, pollution and disruption to wildlife. The 40 to 50 vehicles of residents will in my view add considerable congestion to an already very busy stretch of Norwich Rd. The only possible access is only 20 metres from the traffic light controlled pedestrian crossing. Entering and leaving the development will be hazardous and lengthy when turning across traffic. Getting out of Valley Lane, for example can often take a number of minutes. Additional traffic so close to the primary school will expose the children on foot to more pollution and hazard. I am surprised this access is considered suitable for a development that size.

Individuals	Number Received	Summary of Responses (Site Policy DS10)
Summary of Objections	1	Concern raised over the environmental impact of development and the impact on the Conservation Areas. Concern with the potential density of the scheme, associated noise levels, pollution and disruption to wildlife. Access issues and safety concerns, more cars add to existing congestion.
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary		Limited comments received on this policy. Concern over the environmental impact of development and the impact on the Conservation Areas. Concern with the potential density of the scheme, the associated noise levels, pollution and disruption to wildlife. Also raises issues with access, safety and more cars add to existing congestion.
Council's Response		Noted. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and the potential impact on heritage have been taken into account. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements. The proposed allocation would need to comply with all relevant policies in the Local Plan in order to secure planning permission including but not limited to those on pollution, wildlife and heritage.

DS11: Land at Heath Farm

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS11	H20	Adams, Mr (1215905)	LP592, LP595	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: If this area is to be developed it should be designated as employment land and the housing allocation moved to the proposed employment land at Heath Farm - H27/1. This area (H20) can be accessed almost directly off the A148 without the need to travel any significant distance though an area of housing. The impact of road noise on an employment area is of little significance. It could create a short and safe access to the bypass for the existing commercial units in the barns and ancillary building at Heath Farm and for the agricultural and supply vehicles serving the farm itself. . If the Council aims to provide housing with the best possible residential amenity then it should, where possible, avoid building housing close to busy main roads and also minimise commercial traffic flows through a residential area. - Designating H27/1 as residential and H20 as employment would -</p> <ul style="list-style-type: none"> • reduce the number of commercial vehicle traveling through an existing residential area. • Provide new dwellings in an area where they would not be subject to significant road traffic noise from the a148. • provide new dwellings close to an area of public open space helping to promote a healthy lifestyle. • provide a small break between the two areas of housing giving the feel of two separate areas with their own identity making the overall site feel smaller and less out of proportion to the existing settlement. • provide safe and easy access for vehicles accessing the farm and associated industrial units again reducing commercial vehicle movements along the Hempstead Road without increasing commercial vehicle movements through a residential area and improving road safety on the A148 . - The size of the site is out of context to the settlement and is expanding too far into the countryside. The site size as proposed in H20/1 is more than enough. . See comments at 14 proposals for Holt explaining why it would be more suitable for use as employment land. - The size of the site is out of context to the settlement and is expanding too far into the countryside. . The site size as proposed in H20/1 is more than enough. . See comments at 14 proposals for Holt explaining why it would be more suitable for use as employment land.
DS11	H20	Adams, Mr (1218558)	LP629	General Comments	<p>The site specific requirements attached to H20 require a site layout and landscaping scheme which considers the proximity of Listed Buildings to the north east of the site; Policy ENV 10 - Protection of Amenity should result in the development having greater respect for amenity of existing residents and residents of new development, with positive impacts upon quality of life and well-being. A site specific requirement should be attached requiring a site layout and landscaping scheme which preserves the residential amenity and privacy of the existing homes . This should include landscaping along the eastern boundary of the site which would also serve to provide a wildlife corridor from the piece of woodland along the side of the bypass to open countryside. The land between the two existing homes on the eastern edge providing an area of public open space either side of an access way leading to the public footpath. , The landscaping work should be carried out in advance of any development taking place giving it opportunity to mature and offer a place of relative safety for the wildlife inevitably disturbed during the development and to mitigate the inevitable disturbance to adjoining residence from building works. . If it is to be residential development then consideration should be given to the provision of allotments along the eastern edge with low rise elderly persons accommodation backing onto the allotments. This would help to blend the development into the open countryside</p>

Individuals	Number Received	Summary of Responses (Site Policy DS11)
Summary of Objections	1	The proposal received one objection, suggest it would be more suitable site for employment, as this would reduce commercial vehicles travelling through residential area and minimise impact on residential amenity. Would not have significant road traffic noise from A148, be located close to open space, provide small break between the areas of housing providing individual identities and feel smaller, provide safe and easy access for vehicles accessing the farm and improving safety on A148. DS11 is out of context of the settlement and expanding too far into the countryside.
Summary of Support	0	None received
Summary of General Comments	1	A site specific requirement should be attached requiring a site layout and landscaping scheme which preserves the residential amenity and privacy of the existing homes, including landscaping along the eastern boundary provide a wildlife corridor, landscaping should be provided before development takes place. Consideration of the provision of allotments.
Overall Summary		Limited comments received on this policy. Concerns raised over the suitability of DS11 for residential as considered this would increase commercial vehicles travelling through the residential area impacting on residential amenity, close to road traffic noise, be out of context and expand too far into the countryside. Suggest amending the requirements to ensure site layout preserves residential amenity and requires a landscaping scheme. Suggest that this site would be more suitable for employment.
Council's Response		Disagree. Considered to be suitable location for residential. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published. Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. The Council has fully engaged with key service providers to identify the likely impacts of development for local highways. Employment provision is provided for in the adjacent site, allocated in the current Core Strategy and proposed to be increased through policy DS12. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement for a landscaping scheme and enhanced pedestrian access.

DS12: Land at Heath Farm (Employment)

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS12	H27/1	Adams, Mr (1215905)	LP592, LP595	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: OFFICERS SUMMARY – If this area is to be developed it should be designated as employment land and the housing allocation moved to the proposed employment land at Heath Farm - H27/1. This area (H20) can be accessed almost directly off the A148 without the need to travel any significant distance though an area of housing. The impact of road noise on an employment area is of little significance. It could create a short and safe access to the bypass for the existing commercial units in the barns and ancillary building at Heath Farm and for the agricultural and supply vehicles serving the farm itself. . If the Council aims to provide housing with the best possible residential amenity then it should, where possible, avoid building housing close to busy main roads and also minimise commercial traffic flows through a residential area. - Designating H27/1 as residential and H20 as employment would - <ul style="list-style-type: none"> • reduce the number of commercial vehicle traveling through an existing residential area. • Provide new dwellings in an area where they would not be subject to significant road traffic noise from the a148. • provide new dwellings close to an area of public open space helping to promote a healthy lifestyle. • provide a small break between the two areas of housing giving the feel of two separate areas with their own identity making the overall site feel smaller and less out of proportion to the existing settlement. • provide safe and easy access for vehicles accessing the farm and associated industrial units again reducing commercial vehicle movements along the Hempstead Road without increasing commercial vehicle movements through a residential area and improving road safety on the A148 . - The size of the site is out of context to the settlement and is expanding too far into the countryside. The site size as proposed in H20/1 is more than enough. See comments at 14 proposals for Holt explaining why it would be more suitable for use as employment land. The size of the site is out of context to the settlement and is expanding too far into the countryside. The site size as proposed in H20/1 is more than enough. See comments at 14 proposals for Holt explaining why it would be more suitable for use as employment land.
DS12	H27/1	Adams (1215905)	LP599	Object	The size of the site is out of context to the settlement and is expanding too far into the countryside. . The site size as proposed in H20/1 is more than enough. . See comments at 14 proposals for Holt explaining why it would be more suitable for use as employment land. .

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Individuals	Number Received	Summary of Responses (Site Policy DS12)
Summary of Objections	2	Objections raise concerns over this proposal and suggest it would be more suitable for residential use; would reduce commercial vehicles travelling through residential area and minimise impact on residential amenity. Would not have significant road traffic noise from A148, be located close to open space, provide small break between the areas of housing providing individual identities and feel smaller, provide safe and easy access for vehicles accessing the farm and improving safety on A148.
Summary of Support	0	None received
Summary of General Comments	0	None received

Overall Summary		Limited comments received on this policy. No substantive issues raised. Concern that the proposal would be out of context with the settlement and expand too far into the countryside. Suggest that this site would be more suitable for residential use than site DS11. And would help to reduce commercial vehicles travelling through residential area and minimise impact on amenity, less noise from traffic, close to open space, provide small break between areas of housing providing individual identities, safe access for vehicles.
Council's Response		Disagree. Site is better linked to employment opportunities and a more suitable location for employment. The new access road from the A148 / Phase 1 development has been delivered to an enhanced specification to ensure appropriate access to the existing industrial estate and to alleviate heavy goods travel from Hempstead Road. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published. Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. The Council has fully engaged with key service providers to identify the likely impacts of development for local highways.

DRAFT

Proposals for Hoveton

DS13: Land East of Tunstead Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS13	HV01/B	Armes, D (1210411)	LP046	Support	I understand that more housing is needed especially affordable housing as young people have to find somewhere to live, but think that instead of building new houses more money should be spent on refurbishing derelict buildings and building on abandoned industrial estates. I strongly disagree with building on agricultural land and woodlands. I think that building 150 houses on site HV01/B should be carefully considered. I believe that careful consideration and planning should be made to alleviate the increased demand on public services these new homes will inevitably generate. It is my firm belief that development should only be able to commence once provisions to increase capacities at local schools, GP surgeries, dentists etc have been firmly committed to. Development in Hoveton should in essence be conditional on securing these commitments to improve public infrastructure before construction work on the new houses can start.
DS13	HV01/B	Cook, Mr Geoff (1218558)	LP209	Object	<p>~I am concerned by the size and density of the development of the preferred site and think that a number of smaller developments would be more in keeping with Hoveton as a large village.</p> <p>~The plan seems to dismiss other sites in Hoveton because the preferred site meets the requirements, but there are no details of the assessment of the other sites. The preference would be for smaller developments e.g. 10x15 or 8x20 rather than 1x150. There is no Interim Sustainability Appraisal of other Hoveton sites for comparison purposes, but they would probably all be suitable for smaller developments.</p> <p>~I am concerned that the proposed road to join Tunstead Road and Stalham Road will create a "ratrun" with increased traffic through the Brook Park development with consequential increase in pollution and risk to residents, particularly children. This is in addition to the 150-300 additional cars as a result of the development of the preferred site.</p> <p>~I am concerned that the projections for traffic volumes over Wroxham Bridge have ignored the impact of the NDR. The pollution study was completed in 2017 before NDR was completed and ignore carbon monoxide. The pollution was above recommended levels for September 2017 but there are no figures for September 2018 and no mention of future projections.</p> <p>~The impact on wildlife...the development clearly does not value the natural environment and does not mitigate against the impact of climate change</p> <p>~It is recognised that Hoveton acts as an important centre for Broads-based tourism and tourism is hugely important to the economy...A large percentage of these trips will pass over Wroxham Bridge unless people get fed up with the traffic queues of at least 30 minutes at peak times in both directions and decide to take their tourism pounds elsewhere.</p> <p>~A Care Home will increase traffic significantly because of visitors to residents, tradesmen, health / social care support. Parking for Care Home traffic needs to be taken into consideration. If the proposed care home is sheltered housing then this is likely to be superseded by mobile phone technology.</p> <p>~Parts of Hoveton are considered at risk from river or tidal flooding and the proposed development site suffers from surface water accumulations after heavy rainfall.</p> <p>~A reduction in agricultural land will make an impact on employment. The decline of arable land will not help feed people in the future and will result in importing more of our food with the consequential impact on climate change.</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>~'Brownfield' sites should be developed first.</p> <p>~The impact of a building site near to existing residents will affect their privacy levels and they cannot be kept free from excessive noise</p>
DS13	HV01/B	Everett, Mrs Susan (1210447)	LP047	Object	<p>Wroxham Bridge as many have eluded to is a pinch point for traffic. Ideally more traffic needs to be diverted into using the NDR so that only local traffic or tourists coming here use the local road. A weight restriction on Wroxham Bridge should be put in place to divert vehicles that make the Bridge single carriageway. This would assist the flow of traffic by not delaying vehicles waiting for large lorries etc to come over the bridge and stop the constant damage and repair required . Consideration for a no right turn from the Bridge into Church Road may help? In reality an additional river crossing or better road links to support all of the proposed building and secure business and prosperity for the future needs to be discussed now! With significant future building planned in North Norfolk and Broadland DC areas what are highways doing to address local concerns? Your consultation document does not address this matter and almost brushes it aside. Unlike expanding a school or doctors surgery the road system cannot be enlarged in the same way! Whilst I understand some planning is required the local infrastructure must be considered in its entirety, one cant simply just ignore the road networks as appears to have happened in your consultation document.</p>
DS13	HV01/B	Hawes, Mr Peter (1210722)	LP079	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The proposed site will substantially increase the traffic in the village causing further congestion throughout the year but especially in the tourist season and greater traffic around Broadland high school and the expansion of the school will cause additional road congestion at school pick up times. Already a safety hazard, a through road will encourage drivers wishing to travel to Coltishall to use it as a rat run to avoid the doctors corner junction, creating further traffic past the school. The current hedge on Tunstead road currently provides a habitat for numerous birds and animals who will suffer if this habitat is removed. NNDC current planning guidelines state that trees and hedges should be protected and this historic hedge must fall in that category. The entrance would be less intrusive if it was placed to the north of the junction to Two Saints Close, provide a clear visibility in both directions along Tunstead Road. The assessment highlights the pressure placed upon the doctors surgery and that the NHS will expect mitigating solutions. Given that your guidelines also require accommodation for elderly people in developments of this size it seems a conflicting proposal as elderly people require more NHS capacity Anglian Water is already experiencing major problems with the capacity to provide new water and treat foul water discharge. The AWA will be unable to extract from aquifers to feed the village of Ludham and Js unable to deal with the normal processing of foul water in a small development near ST Johns church. This makes me question the validity of building further developments of this scale in Hoveton</p>
DS13	HV01/B	Howe, Mrs Alex (1217494)	LP645	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Any new development needs to be sensitively and appropriately sited, which I feel does not apply to HV01/B. 2. New build should include consideration of the impact of climate change, to take into account the forecasts of increased temperatures, severe weather conditions and the need to reduce carbon dioxide emissions. (I see no reference to these issues in Persimmon Homes submission). 3. Existing air quality problem particularly in the specific area around Wroxham Bridge. All new developments will increase traffic levels further adding to this pollution. 4. Increased volume of traffic that all new developments north of the River Bure will bring. Wroxham Bridge is unable to deal effectively with present traffic levels, particularly in the summer months. 7. Persimmon should not be the chosen developer. I understand that the quality of some of the properties on Brook Park leaves a lot to be desired, and the company's response (or lack of it) to the problems brought to their attention (including the installation of the children's play area) has been abysmal. 8. On-going</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>problems with the foul water overflow and Anglian Water has yet to come up with any solution. Any further new housing will only exacerbate the problem until it is resolved. Hoveton & Wroxham Medical Centre is beyond capacity and struggles to provide the service that patients have a right to expect. This is not a criticism of the Centre but of the expectations placed upon it by developers who do not seem to take in the reality of this hard pressed service provision. 9. Access off Tunstead Road through to Stalham Road will be used as a rat-run. Exiting on to the busy Tunstead Road, and close to the high school would create a safety hazard; also around the Brook Park play area with children exposed to the hazards of irresponsible drivers. 10. The character of the village is rapidly changing and the sense of community is being weakened. If we are not careful Hoveton will become just another urban sprawl created by groups of people who do not live in the village but who have the power to create social and environmental upheavals! Remove Brook Park Phase 2 from the Local Plan and look at more integrated settlements in Hoveton. Smaller in size and with a better quality developer. 2. Consider the smaller site along the Stalham Road thus avoiding any 'crowding' of the high school. 3. Should Persimmon remain the chosen developer (and I understand why this might be so) then ensure that the company is required to comply with strict conditions, and that the building work is monitored throughout. 4. Ensure that the Church Field and Tilia developments are included in the 150 dwellings sought for Hoveton. 5. Ensure that climate change resilience, wildlife conservation and habitat protection, are written into any planning permissions.</p>
PS13	HV01/B	Lampard, Nicola (1215757)	LP185	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Hoveton is only one area suffering the effects of housing developments around North Norfolk. At what point does this increase of building in a rural area become unsustainable? The local plan emphasises good connection to public transport, roads etc. There is no mention of Hoveton (& Coltishall) bridges. Hoveton bridge is built of over a 1619 narrow, hump back bridge. The traffic congestion is apparent throughout the year. Locals, and visitors alike suffer because of the often static, slow moving traffic through the centre of the village. POLLUTION - There may be public transport, but buses are caught up in the traffic and the railway is not electrified. People choose to use cars. Hoveton A1151 has the poorest air quality in Norfolk. With further development and associated increase of traffic, there is unlikely to be anything that developers could offer to mitigate this major problem. WATER & DRAINAGE - The water board has already stated that the area is under serious water stress. Norfolk is one of the driest counties in the UK. How will this precious resource be managed with the demands of a large increase in population, and the needs of businesses and agriculture? We know that the drainage in Hoveton is a serious problem. The proposed housing, next to St John's church is being held in abeyance, because of the local sewage network is inadequate. Anglian Water have admitted this is a major issue, and there are implications for further development that would require a new pipe line at considerable expense. Brook Park phase 1 has had on-going problems with drainage since 2015, and only now in 2019 the situation may have been resolved. How is it that Persimmons could possibly build another 150 houses to extend this problematic estate? LOCAL ECONOMY - The local plan is in danger of killing the golden goose. The Broads (considered a National Park) and its tourism is vital to the area. Visitors also place pressures on the area by sheer numbers, and of course the use of their cars. Bewilderwood, Hoveton St John attracted over 160,000 VISITORS IN CARS last year. This attraction alone has a serious impact. The proposed development of Brook Park 2 will use productive agricultural land. Our landscape is important to residents, businesses and visitors, both financially and aesthetically. Quality of life will diminish. SERVICES - The LP doesn't directly address the problems of our already over stretched medical services. Those of us that live in Hoveton, know the difficulty of obtaining appointments, The staff now use any room available, due to</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					shortage of consultation rooms. Concern over the capacity of schools in the village, and whether they will be able to cope with the growing numbers of pupils is being discussed. The children will not only come from the immediate villages, but the expanding numbers from the whole catchment area. Consideration should be given to a NHS dentist to be present in the village. The nearest NHS dentist is over that bridge! ROAD SYSTEM - The proposed road for Brook Park phase 2, is a classic case of "looks fine on paper," This road will be another rat run, causing further pollution to the residents. The connection between Stalham Road and into Tunstead Road, will increase considerably (April 2019 37000 cars used it). The junction at Tunstead Rd and Horning Rd West, is often congested with traffic backing up from the double roundabout from the main A1151. This is always a busy road junction, used by Broadland Academy a many businesses in the area including yacht builder, Oyster. Hoveton has reached that tipping point.
DS13	HV01/B	Lincoln, Ms Karen (1209571)	LP640	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is no doubt that, should further development be needed in Hoveton, that this area is the best for that purpose, but very tight restrictions and control should be exercised to lessen the impact upon the community will need to be used. The linking of Tunstead road and Stalham road, by way of the new development and Brook park should not be an option. One of the only two public open spaces, in Hoveton, is on the Brook park estate, it is, at present, set in a quiet residential area with very little traffic and good air quality, this would change if the road was opened up to through traffic. The danger to children, who would be playing there, with open access from the open space to the road should be obvious, the fact that this action would see the estate cut in two, with a busy road is probably less. Most groups of houses have designated parking areas with a narrow entrance to access them. Getting in and out of those areas would be difficult if it were not for the fact that traffic is, at the moment, 'access only'. Problems at Brook Park with the landscaping and more concerning the drainage system on the estate is still ongoing and the play area, promised by the developers has still yet to open. Even when it is, it is not as was agreed on the S106 agreement.
DS13	HV01/B	Lowther, Mr Ian (1210039)	LP025	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The primary school (St. John's), was over subscribed this year, due to the recent expansion both Wroxham and Hoveton. Although I'm not aware of the High school's figures, I can only assume it faces similar issues. I'm not aware of any plans to expand capacity and can't see why 150 extra homes can be entertained without doing so. The traffic Along the A1151 through Hoveton and Wroxham has been worse than ever recently, with long tail backs of stationary vehicles in both directions becoming ever more commonplace, the addition of these extra homes will only compound the problem which creates pollution and effects the safety of children, attempting to cross the road from the new homes to the primary school. The plans for the new estate include linking Salhouse road through to Tunstead road. This will create a 'cut through' that I expect many frustrated commuters will use to avoid the bottleneck of the two mini roundabouts in town. As the ultimate bottleneck is the bridge and the ever increasing amount of road works that seem to be occurring recently, this won't alleviate the problem at all but expand it into the estate. I fear that the Brook Park estate will simply end up with the same stationary traffic/pollution problems that we currently have at peak times on the A1151 or heavy passing and potentially speeding traffic at quieter times, changing the estate from it's current family friendly condition to being unsafe for children. Additionally, residents here can expect several more years of construction traffic passing through that they have barely just finished from phase 1. It's also noteworthy that construction is still ongoing to complete the play park on the estate's green. (The late completion of this raises further questions of Persimmon Homes, the proposing house builder's competence.) This green, long overdue (4-5 years) and long awaited by residents could now become sited next to another busy commuter road instead of a quiet residential one.

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS13	HV01/B	Miller, Mrs Pat (1210642)	LP121	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There has been some discussion in the village about having smaller developments ‘dotted around’ rather than one large site. I realise this is not a proposal within this Draft Plan but feel that it should not be considered for, at least, the following reasons: • Small developments with potentially different developers will not be able to deliver the same range of community benefits – an acceptable level of affordable housing, elderly care accommodation and infrastructure requirements. • Landowners offering parcels of land suitable for small developments could then go on to claim that the rest of the land was no longer economically viable as agricultural land and needed to be developed. Hoveton would then begin to ‘sprawl out’ in all directions and lose forever its already tenuous hold on being a beautiful village! Indeed, if great care is not taken, ‘urban sprawl’ could be the fate of many Broadland villages which would undermine the important economic benefits of tourism in the area. Taking all of this into consideration, the preferred proposal site does seem to offer the best option for Hoveton for the following reasons: • Its location limits the potential impact on the Norfolk Broads, River Bure and the landscape more generally. It ‘sits well’ within other residential developments in Hoveton. • The community benefits offered (affordable housing, elderly care accommodation and infrastructure requirements) take into account the needs of the village. However, it is essential that any developers are not able to reduce or remove these benefits, ignoring policies put in place to protect them, in their claims that they are ‘not financially viable’. From previous experience (relating to the Church Fields development in Hoveton) this can, quite easily, be done.
DS13	HV01/B	Neary, Mrs Virginia (1215726)	LP119	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Withdraw proposal for new housing in Hoveton, keeping the land for continued agricultural use or creating allotments for local families. I believe a state of equilibrium is preferable to unfettered growth in order to provide a decent quality of life for local people. 1. Major traffic congestion & pollution issues along the main Norwich road, this has been an issue for many years & has been noted to have increased significantly in recent years. Concerned a road between the Stalham & Tunstead will inevitably lead to people using this as a 'rat run'. 2. There are limited employment opportunities in the local area, with much of it being seasonal, necessitating travel to the city & other areas for work, creating additional issues with congestion & pollution. 3. The 2 schools in the village are currently over subscribed & there is a large number of other local villages in their catchment area. 4. Public transport is inadequate- bus services have suffered recent cuts 5. The appropriation of valuable green belt land is something that can't be undone, with Brexit & an uncertain future we should be ensuring sufficient land is used for crops. 6. There is a rich range of wildlife in the area, & their habitats are becoming ever smaller. The hedge along the Tunstead Road is home to many nesting birds, there are hares on the fields as well as foxes, deer & buzzards. 7. As with local schools, the Hoveton & Wroxham medical centre is overburdened & it can take weeks to see a doctor, & longer if you want to see your own doctor, significant for people who want to see medical staff who know them & are familiar with their individual health issues.
DS13	HV01/B	osborne, Mrs margaret (1210388)	LP041	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Concerned that the road connection from the proposed development of HV01/B appears to be joining Tunstead Road close to the footpath across the existing development. On coming out of Two Saints Close, the traffic is often very fast and takes time to slow down to the 30mph limit as cars enter the village. Would it not be more sensible to have the new road come out opposite Two Saints Close to join a mini roundabout. This would have the added bonus of slowing the traffic down before it enters the village and create a safer environment for children coming out of Broadland High School.
DS13	HV01/B	Smith, Mr Mark (1209582)	LP042	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Less dwellings proposed for development HV01/B with a higher ratio of low cost affordable homes available. Do not allow new developments to be over populated.

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					Brook Park in Hoveton is a good example but the preferred option in the village of HV01/B seems to have a higher density with less open space, a lot of dwellings for the size of the plot and judging by that smaller gaps between houses. This is not keeping with the character of Phase One. (Information based on previous development layout prepared by developer).
DS13	HV01/B	Smith, Mr Mark (1218514)	LP031	General Comments	Directive 2011/92/EU of the European Parliament was agreed to be amended on 16th April 2014 and is now referred to as Directive 2014/52/EU. All member states were to comply by applying the legislation via its own national laws by 16th May 2017. Particular interest to all those that shall be affected by proposed developments is Article 3, items 1(a), 1(c), 1(e) and item 2. The impact of detriment to the current air quality and the affect on human health. Substantially the legislation restricts any development where the impact would decrease the quality of air where currently good quality or improved quality air is enjoyed. There is no lower limit of pollution to adhere to, basically alleviating the possibility of increasing the pollution to within higher acceptable/permitted levels to the detriment of an established settlement. There seems to be no substantial reports site specific on the impact to human health within the environment section of the draft document. (The document in its entirety is massive so if I have simply not found the information I seek, apologies). Further to air quality presenting a risk to health noise should be considered also. Such matters that should be considered during construction stage should conclude the least intrusive positioning of site facilities, the route to and from the site and the orientation that a development is constructed so to present the noise pollution and disturbance to established settlements for the least amount of time. Whether this is because noise can be monitored and averaged over time, I do not know. The longer term impact of noise may be presented for example by a current access road becoming a main thoroughfare between two main roads such is the case of the proposed HV10 site. Not only shall the noise be increased to the properties that line the road but to a lesser degree all residents of the established settlement. There is a high probability that the link road through this estate shall become a busy commuting route hence increasing the traffic noise (also reducing air quality and presenting safety issues to current road users, pedestrians, residents and children). Can only upload one file so cannot provide the researched evidence to support the affects of noise pollution but some symptoms are commonly reported to be sleep deprivation, stress, heart disease and hypertension. With reference to SA10 and the impact of development upon mental health and well being, should the impact upon a community regards its outlook be assessed? For example, residents outlook from windows changing from open fields with wildlife to bricks and mortar. There would be a definite impact but how has this been assessed and measured against what?
DS13	HV01/B	Smith, Mr Mark (1209582)	LP032	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Services in Hoveton are overstretched and may not necessarily be able to support an additional 150 dwellings. For example, an additional 150 dwellings will have an impact upon the quality of education. Additional pressure on the road network, increasing congestion. The bridge is not suitable for the proposed increase in traffic. The link road planned through partly established and part new settlement is a dangerous and detrimental gamble by the planners. The new link road will be used as a shortcut by residents and commuters. Maintain the established road into HV01 as an access only road but extend into Phase Two. A different approach by the planners allowing large scale development in isolated locations could easily have been sourced and strategically placed to suit travel and commuting. Large scale developments attracts large developers willing to build facilities such as medical centres, schools, village halls. Bus operators are attracted to large scale development.

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS13	HV01/B	Smith, Mr Mark (1209582)	LP033	General Comments	SD5: The preferred option by the planners allow them to ensure planning consent is conditional. Shall be able to specify requirements that will be placed upon the applicant that needs to be evidenced by the applicant at planning stage. Construction stage of any development needs to be assessed and agreed by planners not developers. Established residents that will be neighbouring such development should be consulted and considered by the planners so as little detriment during the construction stage is endured. Such matters as safety, air pollution, noise pollution, access should all be considered and agreed with residents prior to consent being granted.
DS13	HV01/B	Smith, Mr Mark (1209582)	LP037	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY</p> <p>Object to Site HV01/B, extension of Brook Park, on the basis of Policy SD13; Pollution and Hazard Prevention/Minimisation.</p> <ul style="list-style-type: none"> • The development is currently served by an access road directly linked to a roundabout on the Stalham Road. The road is a safe road that is mostly travelled by residents that understand the dangers of the road such as children playing alongside and crossing and drive accordingly. The road is not a busy road and offers very little safety concerns. • Hoveton is the first village of North Norfolk via the Stalham Road. A road bridge exists in-between Wroxham and Hoveton and provides one of the most popular river crossings from North Norfolk to Norwich or vice versa. Road traffic is ever increasing and the frequency of long tailbacks through the village of Hoveton has in the last five years increased albeit mostly affecting traffic due South. The councils only measurement of road traffic emissions being over the national average during its most recent survey occurred in the village of Hoveton. The village is also popular with tourists and day trippers due to it's parking facilities and it's own retail outlets. Good for businesses and the council but not as good for residents due to pollution. • Tourism is increasing in North Norfolk and the route through Hoveton is popular. As part of the councils draft local plan many more housing developments are planned in North Norfolk in villages and towns North of Hoveton and North West. The route through Hoveton is currently a popular commuting route to and from Norwich for current residents in the villages and towns North and North West of Hoveton.. An extension of the current access road serving HV01 to become a link road between Tunstead and Stalham Roads will offer commuters from North Norfolk an attractive route to and from the Wroxham Road Travelling from the A149 through Tunstead and then through the Brook Park estate to the roundabout then through Hoveton. • What is the action plan of the council to prevent an increase in all pollutions? It is my view that an increase in all pollutions is inevitable due to the volume of traffic increasing through the estate due to a link road. Pollution will increase regardless even if the road was to remain an access only road simply due to more vehicles accessing their properties. The latter though being a more predictable and manageable increase that would give residents more confidence in any action plan. Given the predicted increase in volume that will travel the Stalham Road, tailbacks heading South shall become more frequent and longer. Hence, when on occasions the rear of the tailback can be joined at the doctors surgery, it shall possibly extend back northwards over the roundabout and prevent traffic leaving the new link road onto the roundabout causing tailbacks into the estate meaning a massive increase in static emissions, noise and in the darker months, light. • The link road does not equate to minimising hazards in relation to SD13. The current road is a lightly used safe access road. A new link road changes the implications to consider all the safety detriments of a main thoroughfare. Should the action plan include such measures as slowing the traffic down then the retention times will be greater hence more pollution. The change of use of the road will change the way inhabitants along the road can use the road

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					<p>and pathways. Currently safe for children to cycle up and down and play alongside, I would suggest that as time goes by and the road becomes busier, it would not be safe to chance allowing children the same freedom. I fail to understand how this could fit in with the councils preferred approach to SD13 by reducing or minimising hazards.</p> <ul style="list-style-type: none"> • The above outlines a possible long term scenario that could impact obligations under SD13. The short term is even harder to satisfy due to the construction stage. This in my view is where in compliance with SD13 the entire development becomes unavailable. All the above detriments will be magnified almost beyond control during the construction stage. The preferred approach to the construction site will be via Stalham Road roundabout due to the restriction of the heavy duty traffic passing schools. This strategy in aid of safety I concur but the same risks if not greater exist when the same kind of traffic travels through the established development next to children playing and riding cycles and scooters and the like. Pollution will be magnified and uncontrolled and far more static on the site itself. The dust will be blown from the site to mix in with the magnified emissions and the access road will be, in the summer months a cause of uncontrolled dust anyway. This is all at the risk of health and safety of the current residents.
DS13	HV01/B	Smith, Mr Mark. (1209582)	LP040	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY</p> <ul style="list-style-type: none"> • Access routes are dangerous for existing users. Construction traffic would travel past children either outside of the school or on the pathways while playing outside of their homes. • Ground Conditions: The completed phase one of Brook Park has experienced flooding issues due to very poor drainage through the ground. Attempts to rectify have yet been tested. • Pollution: Not only the construction traffic emissions to and from site but the working plant on site emissions will be detrimental to the air quality experienced by the neighbouring areas. Dust caused by the construction itself and the construction traffic to and from the site will contribute to poor quality air being experienced by residents of the neighbouring areas and in particular the residents of Phase One of Brook Park (ENV 10, 8.84). Noise pollution will be a problem experienced by neighbouring areas due to the construction itself and the heavy construction traffic passing established properties on their access to and from the site as will vibration (ENV 10, 8.83). • Design and layout of new development: The established properties on the western boundary of Phase One Brook Park has the rear of their properties facing west. The sun sets in the west giving light into private open space and habitable rooms. The layout and design of the proposed new development could impact occupiers through loss of light (ENV 10, 8.79). Careful planning would need to be done to ensure low rise development such as bungalows back onto the existing properties at the required distance away so not to cast a shadow and block sunlight to the existing properties hence not impacting occupiers. • Location of construction site compound and the orientation of build throughout development: A builders compound on the western boundary of Phase One Brook Park, bordering established properties whose rear gardens and rear elevations of property face west would endure the utmost disruption and impact of the construction stage. Any stacking of mobile offices would certainly be invasive of privacy into private open spaced the very nature of a

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					<p>builder's compound would impact the same space due to noise and dust pollution (ENV 10, 8.76, 8.77, 8.78, 8.79, 8.83 and (8.84). Further to the location of the compound the orientation of build should be considered to be a major determining factor of how long existing residents of Phase One Brook Park, in particularly the properties that will border the new development, need to endure the construction and associated trades such as scaffold being constructed along the boundary fence line. These detriments in all the same ways the reasoning regards the compound does.</p> <ul style="list-style-type: none"> • Having attended the NNDC physical consultation on 23/05/19 at the Broadland Youth and community Centre, the council officials made it quite clear that the link road planned to route through HV01/B has intention to be part of the contraflow system in and out of Hoveton. This changes the use of the current road from an access only to a main road. The council should use the Housing and Economic Land Availability Assessment accordingly to be truthful. The link road being planned to be for major use causes hazardous risks, pollution (air, light and noise), vibration and has the effect of impacting the experience of how both public and private amenity is utilised by existing occupiers, new occupiers and neighbouring areas. How the council can state in their assessment matrix that environmental impact of HV01/B with a major change of use of the road is neutral begs belief in how they arrived at that assessment. To increase traffic flow and possible congestion immediately increases emissions without even considering the dust, noise, artificial light and vibration. In effect, the assessment needs to be revisited and NNDC's own preferred policy need to be utilised properly to understand the true affect. Conditions affected in the policy are EV 10, 8.76, 8.77, 8.78, 8.82, 8.83 and 8.84. SD13, the council's own preferred policy is also very applicable not only to the complaint regards the development's use of road but all the factors raised. • The policy wording is 'To provide a policy to minimise and where possible reduce, all emissions and other forms of pollution including light and noise pollution and ensure no deterioration in water quality.'. Very relevant in my own opinion. The link road will also invite many more road users and impact the flow of traffic through Hoveton village centre, all trying to cross the bridge. An increase in traffic volume in the funnel of pollution. The one place throughout North Norfolk that registered a pollution measurement higher than the national average in the last available survey was measured outside of the Roy's toy shop in Hoveton. The greater traffic and congestion that will ultimately be experienced by users of public amenities in this area will be impacted by way of experiencing greater pollution more often rising above the national average. To think or rather assess that the volume of traffic travelling through Hoveton in relation to increased tourism in North Norfolk and an additional 2390 dwellings in villages or towns North and North West of Hoveton will not increase traffic volume and congestion in Hoveton at the notorious pinch point called Wroxham Bridge is unrealistic and it is an approach that causes detriment and possible harm to residents, workers, tourists, shoppers and general public at large.
DS13	HV01/B	Smith, Mr Mark. (1209582)	LP039	General Comments	Broadland Council will when considering their own Local Plan and the allocation of dwellings to Wroxham take into account the Hoveton plan. Would it not have been sensible for this to have happened the other way around. Most commuter traffic is to and from Norwich so to possibly reduce the number of properties allocated south of the Wroxham bridge in view of the number of properties to be built North of does nothing to ease congestion around said bridge.

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DS13	HV01/B	Taylor, Mrs M (1210707)	LP078	Object	If the proposed development goes ahead it will result in overlooking of properties at the north end of Tunstead Rd and loss of privacy. The field has already been developed and further extension of building to this site will lead to overdevelopment of the site and loss of character to the area. The existing new development has been designed to fit in with the local area with generous space around many of the properties. A further 150 homes here will result in a major housing development and overcrowding. The highway safety around this site is already very poor and further development will add to the regular abuse of speed limits on Tunstead Rd especially near the school. The Parish Council have evidence of the shocking abuse of speed limits on this road with some vehicles reaching motorway speeds. If developed consider buffering the development with Tunstead Rd as well as the field at the north end. I would like you to consider the alternative sites particularly HV05 and HV08. these sites are in close proximity to the primary school where young families would have the opportunity to walk their small children to school, creating early healthy habits for life. There is also existing easy access to the main road to Norwich by car or bus service. In the existing proposal there is mention of a bus service on Tunstead Rd but the only bus service I have seen is for the school. If the proposed site does go ahead (HV01/B) please can you consider buffering the development with Tunstead Rd as well as the field at the north end. in a previous proposal, a park was planned adjacent to the houses on Tunstead Rd and this might be worth considering again.
DS13	HV01/B	Turner, Mr Anthony (1209585)	LP001	Object	This proposal ignores the constraints imposed by Wroxham Bridge. This has long been a traffic pinch-point, and at peak periods the A1151 is congested all the way through Wroxham and part of the way through Hoveton. Given the available routes, environmental objections to a bypass would be very much stronger in today's social and political climate than they were 35 years ago when the original abortive bypass plan was first mooted. Therefore it does not make sense to add 150 new dwellings to Hoveton -- or indeed any at all. The same goes for the Bureside villages of Horning and Ludham, whose residents use Wroxham Bridge to access Norwich and points beyond. Logically, we cannot go on building out into the countryside for ever. We have to stop altogether some time, so why not now, before the landscape and character of the Broads are overwhelmed?
DS13	HV01/B	Walker, Mrs Kerry (1217345)	LP346	Support	~Brook Park – Preferred site can deliver the necessary type of housing stock to meet local needs and can also provide a good percentage of affordable homes. The site will also deliver an aged care development that is much needed given the aging population. ~Support for the approach of 1 site delivering 150 homes - rather than a number of individual sites as proposed by the PC. ~Growth in Hoveton should be limited to 150 in light of the constraints and planned growth in neighbouring authorities.
DS13	HV01/B	Weston, Mrs Sarah (1216006)	LP150, LP184	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Tunstead Road is already a safety hazard with severe congestion at school pick up and drop off times with parked cars and buses trying to get to school. There are also many heavy goods vehicles heading North throughout the year and seasonal agricultural use, all of which create a danger to school children and pedestrians alike. 150 more dwellings with a through road connection to Stalham Road will increase traffic further and will become a rat run for vehicles that wish to avoid the roundabouts at the junction of Horning Road West and Stalham Road. It will encourage traffic coming from the Coltishall direction to come up Tunstead Road and through the new proposed road onto Stalham Road thus avoiding the village entirely. With all the development that is proposed north of Hoveton in various locations, all that same traffic has to funnel into one of two river crossings, namely Wroxham or Coltishall. The additional pressure of traffic on the Tunstead Road

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					<p>should not be permitted. The build up of traffic does not only affect the Norwich Road Wroxham and the Stalham Road Hoveton, it also causes further problems for the Horning Road and Horning Road West causing a standstill in Hoveton traffic during the summer months. With the addition of a further number of homes being built on Church Fields Hoveton, this all adds to the congestion bottle neck of The Bridge and also to a lesser extent the two mini roundabouts. Further planning of dwellings should be seriously considered south of Wroxham Bridge where there is direct access to both Norwich and the NDR.</p> <p>Access to the proposed new development appears to be sited nearly opposite to the entrance of Two Saints Close, with some comments suggesting that there may be a roundabout in the future. Would it not be more appropriate to site the entrance road further north of Two Saints Close which would give a clearer viewpoint of traffic travelling in both directions. It must also be pointed out that traffic is moving faster before entering the 30mph limit area. With the proposed development comes the additional impact on all our local services, with local schools in Hoveton and the Hoveton & Wroxham Medical Centre oversubscribed. The local wildlife also needs consideration, at present the current hedging on Tunstead Road that fronts the proposed development is home to many bird species and animals, these have already had their habitat squeezed by the development of Brook Park. We need to maintain green space in our environment.</p> <p>Exit only onto Stalham Rd. Further public transport needs to be considered. Development should be located on Wroxham side of the river where access to the NDR and Norwich is more practical.</p>
OS13	HV01/B	Williams, Ms Katie (1209757)	LP009	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Broadly support this site. SCHOOLING / EARLY YEARS: Ensure sufficient primary and secondary school places are made available from the point at which residents start living in the new homes. There should be no staged introduction to school places - places should be made immediately available for new local residents so parents do not have to cope with the stress of transporting children to out of village schools whilst also having to manage their own commutes to work. Following the publication of data on primary school entrance places in NNDC, it should be noted that Hoveton St John Primary School filled all 30 of its available places in 2019 and had to refuse 6 applicants. Given that a new development of 25 houses is already in the process of being built in Church Fields (which, by conservative estimates, will inevitably be home to at least several primary aged children), this situation will only get worse. Expanding the primary school therefore seems not only a logical, but an entirely necessary, step to meet demand. It is also necessary to consider secondary school places at Broadland High School. At the moment that school only teaches up to 16 years of age, but given the new influx of children through Hoveton's expansion (as well as Wroxham's allocation of new houses which has to be simultaneously catered for), this cut off warrants serious consideration as otherwise any young person wishing to stay in full time education beyond 16 years will need to travel into Norwich. This is create additional stress on Wroxham Road as those children will either depend on family members driving them into the city or catching local transport. I also believe that given the growth of the village, greater provision needs to be made for young children aged 6 months to primary school age. In my opinion, the current size of the nursery linked to Hoveton St John is insufficient to meet demand. I personally have to drive my son to a nursery in Spixworth three days a week so I can access childcare that starts early enough and finishes late enough to allow me to work a normal working day. MEDICAL CENTRE: Similarly, capacity at the Hoveton & Wroxham needs to be increased to meet the growing demands placed on it. I am sure with careful planning this can be achieved as the facility certainly seems large enough from a lay person's perspective. ROAD ACCESS: Stalham / Norwich Road (especially over the bridge) is already arguably at capacity during the peak</p>

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					summer tourist months. Any road works that need to be carried out should only be allowed to take place during the late evenings and through the night as otherwise the disruption is colossal and in my view entirely unacceptable for existing residents who have had to queue in excess of 30/40 minutes to get over the bridge. The answer is not to push drivers to take the detour via Coltishall, as all that does is create problems for that village, but to get a handle on Hoveton & Wroxham's own traffic bottleneck. Ultimately a by pass would be the answer, but clearly that comes at huge expense. TRAINS: Given the number of new residents who will be joining Hoveton and Wroxham, I think a review of the frequency and carriage numbers of trains travelling towards Norwich is warranted, especially as some of the other towns requiring to take new homes are also on the same line. It is very likely that a significant proportion of the new residents will find employment in Norwich, so we should try and promote train use wherever possible to free up the roads. BIKE SCHEME: One viable way to get people to travel around the local area more, rather than depending on their cars so heavily, is to create a 'Boris Bike' type scheme with drop off hubs dotted around the wider area (including a large one at the station). This would obviously necessitate having to invest in good cycle paths, but I do think there would be a good deal of traction with tourists, plus it would be environmentally friendly. Development in Hoveton should in essence be conditional on securing these commitments to improve public infrastructure before construction work on the new houses can start.
DS13	HV01/B	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The originally proposed allocation of 100 - 150 is generally supported as a recognised start point, but somehow that's been changed to approx. 150 which is potentially very different and wouldn't be supported! In that regard this is an objection. However, using whichever figure, it must be seen and justified in the context of what BDC allocates to Wroxham because Hoveton and Wroxham are in effect one community of 2 large villages. It must take account of the traffic impact on the A1151, the impact on the existing poor air quality problem in the village centre and the NCC Market Towns Traffic Survey aiming to reduce traffic congestion and improve traffic capacity. It must also take account that Hoveton already has 2 recent major 'windfall' sites awaiting development: 22 units at Church Field and 28 units on the Tilia Tunstead Rd site. The traffic impact of these won't be known until they are built but it will be significant on current levels. If it's judged that 150 new homes is appropriate in Hoveton then it's my submission that the 50 already in the pipeline should be counted against that 150. The most recent indicative outline plan for the Hov 1 site includes a form of care home which would provide significant appropriate accommodation for the elderly and infirm and provide employment and capacity within the care sector. Hoveton has a need for this kind of accommodation and providing it's integrated well then it would be welcome and should further support the case for a 100 home allocation. Object - but the grounds for objection may be removed if the allocation took the above points into account and didn't exceed 100 new homes, in addition to a care home development. Choice of site - HV01/B is generally supported as the preferred site and seems to be the most logical although there are several aspects of the indicative layout that merit change; in particular, access to Tunstead Rd and the option for a mini-roundabout at the junction at Two Saints Close, routing and safety of the through road to Brook Park and the density and balance with green space for wildlife habitat and interconnection with adjacent habitats. The other major constraint is foul water network capacity and the impact of additional demand on the lower parts of the Hoveton network. This is the subject of a 'position statement' by AWA which recognises the lower network constraints and the need for ongoing protection against network flooding; moreover, it requires future major development to be accompanied by a foul water drainage strategy which wouldn't impact on the lower network. While that's an engineering challenge, and not a reason to argue against this site, it's likely to

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					<p>affect the deliverability of the site. There is still doubt over whether strategically this site may be needed for education expansion of Broadland High School or a 'common campus through school' by relocating St Johns PS. Development of this site will effectively land lock BHS and restrict growth options in the long term. To date there's been no hard evidence that this site will not be needed for education use - this matter needs to be formally resolved before the site is allocated for residential use. Object - but the grounds for objection may be removed by ensuring schemes comply with the above proposed changes and requirements. Sustainability –</p> <p>Object - In general Hoveton scores well but in terms of the rural and Broads character of the village the HV01/B site needs to be designed so that it integrates well with the countryside and to ensure it doesn't urbanise this part of the village. Object - but the grounds for objection may be removed by ensuring the strategy changes at 2, 6, 7 & 8 above are adopted and included in the scheme to deliver the allocation. Habitats and Environmental Impact - Object - The pressure of spreading development into the countryside is intense and currently wildlife is simply displaced mostly by habitat loss. Conversely, the pressure of climate change and the need to protect ecosystems and wildlife habitat is also rising rapidly as we understand more about past development damage and our reliance on wildlife in all its forms to mitigate the impact of climate change. We are also learning about how habitat can be recreated and protected during the design and specification of major development. The development must be environmentally engineered so that it integrates the needs of wildlife in terms of habitat, food sources and safe connectivity of adjacent protected habitat areas; this includes restrictions and requirements around domestic areas to help support ecosystems at the expense of clinical and sterile manicured gardens and public area landscaping. Object - but the grounds for objections may be removed by ensuring the strategy changes at 6,7 & 8 above are adopted and include in this supplementary document.</p>

Individuals	Number Received	Summary of Responses (Site Policy DS13)
Summary of Objections	13	<p>The responses primarily focus on issues with existing infrastructure in Hoveton and concerns that development would result in increase in traffic through the settlements especially on Wroxham Bridge, Tunstead Road and Stalham Road would become a rat run. Issue exacerbated by an extension of the school and a new care home. Some comment on the size and potential density of the site having an impact on character of the village. Other concerns include: air quality issues, biodiversity impact, flooding risk, amenity impact on residents and the impact of the loss of agricultural land on employment and food supply in the future. Adding additional pressure on the doctors and schools and exacerbating issues with drainage and water stress. Current issues with the public transport available - buses caught in traffic, railway not electrified. Also concerns over the potential impact on the economy.</p> <p>Suggests that the hedge along Tunstead Road should be retained. And whether a number of smaller developments would be more in keeping with the village. One comments on the lack of detail available on the site assessment and sustainability appraisal of other sites. One proposes alternative sites HV05 and HV08, perceived to be closer to primary school and easier access to main road.</p>
Summary of Support	5	<p>A few respondents consider this the best option for further development in Hoveton. That elderly care accommodation is needed given the ageing population and extending the school is necessary. Support for the delivery of one site rather than a number of smaller sites. Need affordable housing. Development should only start once capacity at services is provided.</p> <p>Some concerns over access and increased traffic on surrounding streets (and Wroxham Bridge) especially during peak summer months. One suggests that there should not be a link between Tunstead Rd and Stalham Rd, as this could increase traffic and have an impact on the open</p>

		<p>space in Brook Park and cause safety concern for children.</p> <p>Suggestions that a bypass road would resolve traffic issues and improvements would be needed to the public transport. And to ensure sufficient school spaces are available and capacity at the medical centre is increased.</p>
Summary of General Comments	6	<p>Six general comments received. Seems the most logical site and there is a need for a care home. Concerns over access to the site and increased traffic especially over Wroxham Bridge and concerns that Tunstead Rd through to Stalham Rd will be used as rat-run. Existing issues at properties at Brook Park and on-going issues with foul water. AWA recognises the lower network constraints and the need for ongoing protection against network flooding. Future major development to be accompanied by a foul water drainage strategy. Other concerns; existing and likely air quality issues, potential noise pollution and amenity impact on existing properties. The potential impact on the character of village and sense of community, if not careful Hoveton will become an urban sprawl. Need to consider the potential impact of Wroxham Development. Medical centre beyond capacity. Support for this site over a number of smaller sites which wouldn't deliver the range of community benefits needed. This site sits within the residential area and therefore would limit the potential impact on the landscape, The Broads, and the River Bure. One suggests that development should be positioned to reduce potential noise pollution. Need to take into account other sites in the pipeline. To date there's been no hard evidence that this site will not be needed for education use - this matter needs to be formally resolved before the site is allocated for residential use. Development should be designed so that it integrates well with the countryside and to ensure it doesn't urbanise this part of the village. The development must be environmentally engineered so that it integrates the needs of wildlife in terms of habitat, food sources and safe connectivity of adjacent protected habitat areas; this includes restrictions and requirements around domestic areas to help support ecosystems at the expense of clinical and sterile manicured gardens and public area landscaping.</p>
Overall Summary		<p>A number of concerns raised, which focused mainly on the potential impact of development on this site on the existing road infrastructure in Hoveton; the increase in traffic on surrounding streets, especially on Wroxham bridge, between Tunstead Road and Stalham Road and through Brook Park. Concern that an extension of the school and a new care home on the site would exacerbate traffic problems especially at school pick up times. The size and potential density of development could impact on the character of the village. Other general concerns are: air quality issues, noise pollution, biodiversity impact, flooding risk, amenity impact on existing residents. The loss of agricultural land and the impact of this on employment and food supply in the future. Adding additional pressure to doctors, schools and exacerbating issues with drainage and water stress. Development should only start once capacity at services is provided. Public transport issues. Some suggest that a number of smaller developments would be more in keeping with the village and that a bypass would resolve traffic issues. Hedge along Tunstead Road should be retained. Questions the detail available of the site assessments and sustainability appraisal of alternative sites in Hoveton. Some consider this site as the best option for further growth in Hoveton, and prefer this to developing a number of smaller sites that would not provide the community benefits needed. Elderly care accommodation and the potential increase at the school would be welcomed. The site would have limited impact on the landscape and The Broads. Should consider the potential impact of development in Wroxham. Evidence that the expansion of education use is needed and should be resolved before being allocated. Development should be designed so it integrates with the countryside and ensure that it is environmentally engineered to integrate with the needs of wildlife.</p>
+		<p>Noted: Consider comments in the development of the policy. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views and air quality issues have been taken into account. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion, access arrangements and cumulative growth where the Highways Authority is undertaking ongoing assessments through the market town initiatives. Off site Mitigation measures will be a requirement to offset any potential adverse impact. The Council continues to work with Anglian Water to identify and address network issues and establish a position statement. The Council has used current evidence base and engaged with relevant bodies including health and education bodies to identify where additional social infrastructure may be required as a result of new development . The Council has engaged fully with the</p>

		<p>Environment Agency and other relevant key professional bodies/persons. It has used the most up-to-date flood risk evidence base in order to identify the likely flood risk of sites, low probability. Sustainable Urban Drainage Systems will be required. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement for the retention of existing trees and hedgerows around the site. Wroxham is within Broadland District. Broadland District Council, together with Norwich City Council and South Norfolk Council, is in the process of preparing a new Local Plan for the Greater Norwich area but is yet to make decisions about how much development might be considered in Wroxham. The Council co operate on cross boundary issues through the Duty to Co operate and Norfolk Strategic Planning Framework and any cross boundary issues in relation to the Greater Norwich Local Plan / Braods Authority in relation to Wroxham will be taken into account. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and continue to work with site promoters to take into account biodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact.</p>
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Proposals for North Walsham

DS14: Land at Norwich Road & Nursery Drive

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS14	NW01/B	Clark, Mr Ian (1210036)	LP023	General Comments	look at the Cromer rd...Aylsham rd...station rd...a new fuel outlet....and as mentioned..drainage..the towns system is old...and where is the main drainage to this large development going?..reference to the governments papers printed on the initial appeal that refused the greens rd plan...
DS14	NW01/B	Correa-Hunt, Mr David (1218558)	LP783	Support	<p>~The Town of North Walsham has a favourable site on somewhat elevated arable land only a few miles inland from the popular North Norfolk coast sixteen miles north of the County Town, Norwich.</p> <p>~Recent decades have seen substantial growth of Residential development surrounding the town, which is now the largest urban area in North Norfolk, and growing.</p> <p>~ the original streets are narrow and contorted and accordingly basically unsuitable for today's motor traffic. Provision for pedestrians (and cyclists) is deplorably inadequate and in places totally lacking, which is obviously a public danger. The so-called "Bypass", the outcome of a past decision to reroute the A149 (Yarmouth-Cromer) Road along the alignment of a former railway, is not in fact a bypass at all. The result is a busy highway that virtually bisects the town.</p> <p>~The Railway Station is unfortunately on the other side of the A149 road, from the Town Centre. There is absolutely no provision for bus stops at the station. Moreover the location of the station is rendered inaccessible to the double-decker bus services owing to the low rail bridge spanning the Norwich Road. The railway line northwards from Wroxham Station is single track and non-electrified. It serves the largest urban area in North Norfolk, which is set to continue growing. Clearly a twin-track electrified line from Norwich would be an enormous advantage to North Walsham.</p> <p>~It would appear to be desirable for the A149 to be rerouted (once again) to constitute an actual bypass passing to the west of the Urban area. It could then ring and define those areas that it is now planned to develop for yet further residential expansion. The periodic traffic congestion occurring in the town at present has evidently been exacerbated by extensive growth of residential areas surrounding the town.</p> <p>~Conservation and Re-Vitalisation of the C.B.D The Central Business District/ Town Centre needs special consideration: it should become a Conservation- Redevelopment Zone (in planning law) comprising: Market Place / Market Street; King's Arms Street (part); The Precinct/ Church Yard; Church Road etc. [also possibly; Aylsham Road (part); Cromer Road (part); Mundesley Road (part); and Vicarage Street]. Additionally, through traffic flow must be eliminated from that part of Yarmouth Road separating Market Place and Roy's store, from the Post Office and Lidl's supermarket.</p> <p>~In the 19th century there has been an unfortunate encroachment into the S.W. part of Market Place; visually it appears to crush the unique (pavilion-like) 17th century Market Cross (iconic feature of the old town) into a corner. Also it also completely masks the Kings Arms Inn. Accordingly consideration should be made to removing this encroachment. (But 18th century "Waterloo House" should be retained). The suggested removal would open up a vista from Market Place into the Square formed by Paston College Buildings. Conservation of the Market Place would entail its permanent "PEDESTRIANISATION". To implement this it would be necessary to form a traffic circulation route surrounding the CBD with provision for short-term car parking and convenient access to the Market Place for pedestrians and cyclists.</p>

					<p>~A basic amenity must be the provision of access and space to accommodate rail / bus interchange at the railway station. The constructive approach would involve much creative and discerning “town design” to conserve the attractive old town and to adapt it to the needs of the 21st Century without destroying its historic character.</p> <p>~The ancient Market towns of North Norfolk, such as Aylsham and North Walsham are being subjected to official pressure to expand by the government’s Housing Policy. It is perhaps regrettable that the possibility of the creation of an “Eco-Town” on the site of the former Coltishall Air Base, is not to be implemented. Such development could have saved the old towns from pressure to expand, which could, unless handled with great skill, lead to the ruin of their historic character.</p> <p>~Natural features of the landscape, such as the shallow valley of the Ant River, should be determining factors in this gentle landscape. All development must be designed with the utmost sensitivity to the environment and with cognisance of the fact that the productive agricultural land that we have inherited is irreplaceable.</p> <p>~ If future plans for Paston College (as mooted) include desired move to an out-of-town site, this could offer the town a unique opportunity for the conversion of the fine (listed) existing College Buildings to form a worthy Civic Centre / Town Square (adjacent to Market Place) for the town, to augment its stature.</p>
DS14	NW01/B	Cossey, Ms Donna (1218402)	LP729	Object	<p>~I wish to state my concerns for further residential homes in North Walsham. Problems already in town without further houses.</p> <p>~North Walsham Infant and Junior School already teach some lessons in corridors as not enough room. Sometimes in the school hall / dinner hall there is not enough tables and benches so children have to eat on the floor.</p> <p>~North Walsham dentists.... family members have to travel to Hemsby to see a dentist. Young children, well lots of residents are without dentist in North Walsham. North Walsham Doctors sometimes 2 or 3 week wait to see a Doctor.</p> <p>~North Walsham town center is a standstill from 2.40 until 3.40 around school pick up time. No one moves just sit in car and move slowly.</p>
DS14	NW01/B	Smith, Mr Matthew (1209593)	LP002	Support	<p>I support the need to grow and develop and believe that a Local Plan in the best way forward. What needs to happen is Section 106 funding must come to North Walsham (and other NNDC towns) first and work must be undertaken to improve infrastructure before homes are signed off/sold. In particular school places and access to quality play park provision are vital for the youngsters in the town. Local charities such as North Walsham Play are best placed to support with this going forward. Please do give this suitable consideration.</p>
DS14	NW01/B	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<p>We share the concerns which North Walsham Town Council has expressed about this policy. While we agree that there is a requirement for an independent Development Brief to guide any future development of this site, we too think that the policy is insufficiently precise in its treatment of utility provision. As a part of this Development Brief, we think that there must be a requirement to demonstrate sufficient capacity in electricity and telecommunications to meet the needs of any proposed development. We note too that there is no explicit reference to the North Norfolk Design Guide in Policy DS 14. We would hope to see additional wording within this policy in order to make specific North Walsham’s requirement for a well designed development with proper provision of essential utilities.</p>

Individuals	Number Received	Summary of Responses (Site Policy DS14)
Summary of Objections	1	The proposal received one objection. Existing issues with congestion. Concern about capacity at doctors and dentist.
Summary of Support	2	Two support this site, recognising North Walsham as the largest urban area in North Norfolk and the need for it to grow. However comment on concerns with the existing road infrastructure, with the town suffering from traffic congestion exacerbated by residential growth in the town and the lack of pedestrian and cycle routes. Suggest that it would be desirable to reroute the A149 and to improve the railway station. Also for the town centre to become a Conservation Redevelopment Zone and be pedestrianised. Development should be designed to be sensitive to the environment and Section 106 funding must come to North Walsham (and other NNDC towns) first and work must be undertaken to improve infrastructure before homes are signed off/sold.
Summary of General Comments	2	Two comments received. Concerns over the impact of the proposal on the existing road system and on drainage . Agree with the requirement for a Development Brief but think policy is insufficiently precise in its treatment of utility provision. Must be a requirement to demonstrate sufficient capacity in electricity and telecommunications to meet the needs of any proposed development. Would like additional wording to make specific North Walsham's requirement for a well designed development with proper provision of essential utilities.
Overall Summary		Limited comments received on this policy. Overall support for this site, recognising North Walsham as the largest urban area in North Norfolk and the need for it to grow. However there are concerns with the existing road infrastructure, traffic congestion, lack of pedestrian and cycle routes, capacity at doctors and dentists, electricity and telecommunications and issues with drainage. Suggest that it would be desirable to reroute the A149, to improve the railway station and for the town centre to become a Conservation Redevelopment Zone and be pedestrianised. Development should be designed to be sensitive to the environment and for Section 106 funding to come to North Walsham (and other NNDC towns) first and work undertaken to improve infrastructure before homes are signed off/sold. Suggest additional wording requiring a well designed development with proper provision of essential utilities.
Council's Response		Support noted. Consider comments in the finalisation of the policy. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements. The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Council has committed to the development of a development brief in partnership and will be subject to further public consultation and this will include an overall design framework building on the principles of the District's most up to date Design Guide.

DS15: North Walsham Western Extension

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS15	NW62	Addison Elaine (1210267)	LP075	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whilst I welcome the adoption of a local plan, subsequent to the recently declared 'Climate Emergency' by NNDC, I expected to see more environmentally sound policies and obligations placed on developers for carbon-neutral developments. There is a complete lack of community-led planning in North Walsham, a total lack of infrastructure incorporated into the North Walsham Western extension, and commercial development has also been dismissed for the lifetime of this local plan by not incorporating the bypass road extension all of the way to the industrial estate in North Walsham. This plan should be reviewed, and re-drafted, as in its current form is not considered to be fit for the purpose it sets out to achieve. There are significant risks to delivering its objectives and targets, especially in line with the Climate Emergency declaration. It should therefore be re-drafted and be then subject to a further round of public consultation. Commercial strategy - bypass / link road must join all the way to the industrial estate - this is essential in order to develop North Walsham, and it will allow new residents to work locally. • cycleways to support new housing • commitment to carbon offsetting all of NNDC services • commitment to carbon calculations in local plan • commitment to zero carbon by 2030, which is within the timeframe of this local plan • obligation for developers to use renewable technology • obligation for developers to use rainwater harvesting • obligation for developers to install electric car charging points on new homes • obligation for developers to develop passivhaus / carbon neutral homes • park & ride Legally binding obligation to build social housing, not just so-called affordable housing. Any affordable housing agreed at this stage, will be diluted once the plan is agreed and the developers start squirming out of their projections, and we already have too many residents on housing waiting lists who cannot afford this so-called affordable housing. Infrastructure needs to be embedded within the community. This means schools & health centre within the western extension, so that our over-burdened roads are not broad to a standstill with an extra 4,000 cars trying to get to schools or the doctor. Convenient shops in the western extension, to help develop this as a community, rather than a dormitory area. Review of how North Norfolk can use brownfield sites first, rather than building on green field sites which will weaken our food security forever.</p>
DS15	NW62	Bell, Ms Jane (1218558)	LP799	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Neutral; A new primary school would be a splendid opportunity to design green, sustainable buildings, surrounded by every chance for children to learn about and to cherish the natural world; to learn about ecological relationships - how all life 'fits together'. Darwin's 'economy of nature' can be taught at any level and the need to learn about it is more urgent than ever.</p>
DS15	NW62	Binks, Mrs Susan (1217821)	LP667	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to this proposal. There is a wild field behind Skeyton View which is due to be built on which has beautiful old trees and hedgerows & is home to many many species of wildlife. Many different birds, insects, hedgehogs, squirrels, butterflies, bees both wild and those in hives and I'm sure many many more. The destruction of this habitat would be criminal.</p>
DS15	NW62	Bluss, Mr Andrew (1210045)	LP027	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Given that the average household has one car that is potentially an extra 1500 vehicles on the road adding to an already polluted and congested town. The town's carbon footprint is not going to be helped by the significant increase of vehicles which will lead to slower journey times and</p>

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					<p>more CO2 being pumped into the atmosphere. Do I need to mention schools, doctors, refuse collection, policing etc to cope with the added population? Will there be an increase in the number of buses and/or bus routes to allow commuting?</p> <p>The proposed western extension swallows up a number of public footpaths and the Weavers Way. It is also the site of the 1381 Battle of North Walsham. A very significant episode in our local and social history! Whilst the precise location has not been determined, using the existing markers around the town as a relatively accurate "boundary" then your plans would totally eradicate this site completely. Lastly, the "Link Road" between Norwich Road and Cromer Road. A possible route has been identified for this. Starting just south of the town boundary, cutting across pristine farmland, several public footpaths, across Skeyton Road and joining Cromer Road by Link Road. The pipedream is to push this through to the industrial estates. My understanding is that a feasibility study was carried out a number of years ago on whether the rail bridge on Link Road could take HGV's. The reports findings was that it could. However, lorries have got much bigger in that time and it is difficult to imagine the bridge being able to cope with the amount of sustained traffic (and the additional gross vehicular weight) it would be required to carry without huge cost to make it viable. We have been told that the developers would foot the cost of the link road? How? The average cost of a home in North Walsham is significantly less than those of more "fashionable" towns so the profit margin is going to be equally reduced per unit. So will the percentage of so-called "affordable" homes be reduced to make up the difference? I recognise the need to remove HGV's from the local streets. So I am not dismissing the proposal out of hand but have ALL the alternatives been looked at? For example, why not impose a weight limit of 7.5 tonnes on Aylsham Road at the junction of Greens Road? Prohibited traffic entering North Walsham would be forced to use Greens Road. Place a set of traffic lights with pedestrian usage at the junction of Cromer Road to control access/egress. The speed limit of 30 on Cromer Road could also be moved back to the town boundary as an additional safety measure. I know it sounds simplistic but has lowering the road surface under the railway bridge on Norwich Road been considered? – could solve all the problems in the long term for an initial amount of pain? Have all alternatives been considered to accommodate HGVs rather than a link road. The land between Link Road and Waitrose, could site a significant number of required homes of the proposed plan. Why is this not being considered as the preferred option? The answer, invariably, is twofold. Firstly acquiring the land from the owners and the cost of clearing. My response to that is, what possible reason could there be for the owners to allow land to sit unused for years? The rusting structures that blight Cromer Road are testimony to this. Why not compulsorily purchase the land? Why not change the permitted use from commercial to residential? What price the cost of clearing industrial land compared to the destruction of the natural environment under current proposals? Developments on Norwich Road had to do it so it would not be setting a precedent.</p>
DS15	NW62	Burns, Mr David (1216064)	LP156	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Before any development is considered NW requires a full plan and resourcing of local infrastructure and capacity, particularly rail route to Norwich, associated parking, school capacity, road flows, etc. A full investment plan in the required infrastructure before development as the town needs these today, as any extra houses will be a community burden and unsustainable with existing services</p>

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DS15	NW62	Clark, Mr Ian (1210036)	LP023	General Comments	look at the Cromer rd...Aylsham rd...station rd...a new fuel outlet....and as mentioned..drainage..the towns system is old...and where is the main drainage to this large development going?..reference to the governments papers printed on the initial appeal that refused the greens rd plan...
DS15	NW62	Correa-Hunt, Mr David (1218473)	LP783	Support	<p>~The Town of North Walsham has a favourable site on somewhat elevated arable land only a few miles inland from the popular North Norfolk coast sixteen miles north of the County Town, Norwich.</p> <p>~Recent decades have seen substantial growth of Residential development surrounding the town, which is now the largest urban area in North Norfolk, and growing.</p> <p>~ the original streets are narrow and contorted and accordingly basically unsuitable for today's motor traffic. Provision for pedestrians (and cyclists) is deplorably inadequate and in places totally lacking, which is obviously a public danger. The so-called "Bypass", the outcome of a past decision to reroute the A149 (Yarmouth-Cromer) Road along the alignment of a former railway, is not in fact a bypass at all. The result is a busy highway that virtually bisects the town.</p> <p>~The Railway Station is unfortunately on the other side of the A149 road, from the Town Centre. There is absolutely no provision for bus stops at the station. Moreover the location of the station is rendered inaccessible to the double-decker bus services owing to the low rail bridge spanning the Norwich Road. The railway line northwards from Wroxham Station is single track and non-electrified. It serves the largest urban area in North Norfolk, which is set to continue growing. Clearly a twin-track electrified line from Norwich would be an enormous advantage to North Walsham.</p> <p>~It would appear to be desirable for the A149 to be rerouted (once again) to constitute an actual bypass passing to the west of the Urban area. It could then ring and define those areas that it is now planned to develop for yet further residential expansion. The periodic traffic congestion occurring in the town at present has evidently been exacerbated by extensive growth of residential areas surrounding the town.</p> <p>~Conservation and Re-Vitalisation of the C.B.D The Central Business District/ Town Centre needs special consideration: it should become a Conservation- Redevelopment Zone (in planning law) comprising: Market Place / Market Street; King's Arms Street (part); The Precinct/ Church Yard; Church Road etc. [also possibly; Aylsham Road (part); Cromer Road (part); Mundesley Road (part); and Vicarage Street]. Additionally, through traffic flow must be eliminated from that part of Yarmouth Road separating Market Place and Roy's store, from the Post Office and Lidl's supermarket.</p> <p>~In the 19th century there has been an unfortunate encroachment into the S.W. part of Market Place; visually it appears to crush the unique (pavilion-like) 17th century Market Cross (iconic feature of the old town) into a corner. Also it also completely masks the Kings Arms Inn. Accordingly consideration should be made to removing this encroachment. (But 18th century "Waterloo House" should be retained). The suggested removal would open up a vista from Market Place into the Square formed by Paston College Buildings. Conservation of the Market Place would entail its permanent "PEDESTRIANISATION". To implement this it would be necessary to form a traffic circulation route surrounding the CBD with provision for short-term car parking and convenient access to the Market Place for pedestrians and cyclists.</p> <p>~A basic amenity must be the provision of access and space to accommodate rail / bus interchange at the railway</p>

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					<p>station. The constructive approach would involve much creative and discerning “town design” to conserve the attractive old town and to adapt it to the needs of the 21st Century without destroying its historic character.</p> <p>~The ancient Market towns of North Norfolk, such as Aylsham and North Walsham are being subjected to official pressure to expand by the government’s Housing Policy. It is perhaps regrettable that the possibility of the creation of an “Eco-Town” on the site of the former Coltishall Air Base, is not to be implemented. Such development could have saved the old towns from pressure to expand, which could, unless handled with great skill, lead to the ruin of their historic character.</p> <p>~Natural features of the landscape, such as the shallow valley of the Ant River, should be determining factors in this gentle landscape. All development must be designed with the utmost sensitivity to the environment and with cognisance of the fact that the productive agricultural land that we have inherited is irreplaceable.</p> <p>~ If future plans for Paston College (as mooted) include desired move to an out-of-town site, this could offer the town a unique opportunity for the conversion of the fine (listed) existing College Buildings to form a worthy Civic Centre / Town Square (adjacent to Market Place) for the town, to augment its stature.</p>
DS15	NW62	Cossey, Ms Donna (1218402)	LP729	Object	<p>~I wish to state my concerns for further residential homes in North Walsham. Problems already in town without further houses.</p> <p>~North Walsham Infant and Junior School already teach some lessons in corridors as not enough room. Sometimes in the school hall / dinner hall there is not enough tables and benches so children have to eat on the floor.</p> <p>~North Walsham dentists.... family members have to travel to Hemsby to see a dentist. Young children, well lots of residents are without dentist in North Walsham. North Walsham Doctors sometimes 2 or 3 week wait to see a Doctor.</p> <p>~North Walsham town centre is a standstill from 2.40 until 3.40 around school pick up time. No one moves just sit in car and move slowly.</p>
DS15	NW62	Harrison, Dr Geoffrey (1215953)	LP146	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In favour of link road between Norwich Rd and Cromer Road, would need to be suitable for HGVs, and farm traffic that currently have to pass through the existing western residential area (principally Station Road). The "Link Road" "APPEARS" to be simply another small road through a very densely populated residential area, which would not be suitable or adequate for the volume of, or the type of traffic that it would be used by; would present constant danger for new residents. This traffic is already life threatening for residents of the existing Western section of North Walsham e.g. Station Rd Skeyton New Road and the parallel section of Aylsham Rd where a 20 MPH speed limit is urgently required. How many child fatalities are required for action to be taken? The BYPASS needs to extend past the Lyngate Industrial estate off the Mundesley Road to join the B1145 an increase in population by 5000 would require a 40% increase in all public amenities , and the appalling road between Aylsham & North Walsham would need to be fixed as it would suffer considerably more traffic.</p>
DS15	NW62	Hayes, Mrs Judith (1216770)	LP765	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There has been a great deal of houses and building work around Norwich Road, the road can hardly cope with the amount of traffic going in and out of North Walsham. The traffic lights by the station cannot cope and it takes a very long time to get to and from the town at peak times.</p>

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					This surely will get worse once all the current houses are finished and the new ones built. A link Road will only stop a certain amount of traffic and probably push more vehicles along Norwich Road. It needs to go over the railway line to join up with the main road. The land currently growing crops etc., this type of agricultural land will ever be replaced and the amount of crops etc., will be lost forever. It seems a shame to saturate North Walsham with so many houses and building work expanding the town outwards. Sadly the shops in the town will not keep shoppers in North Walsham as there as so many items that cannot be found or purchased locally.
DS15	NW62	Heal, Mrs Jeanne (1216562)	LP199	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to the proposals for North Walsham: • There is no plan to address the recently declared climate emergency. Creating a commuter town rather than local employment and commerce will increase rather than reduce the carbon footprint. A commitment to ensure that there is social housing provided. The proposed development should only be started after a link road from the Cromer Road to the industrial estate is provided. There is no social housing. The increase in elderly and infirm means there is a need to house workers who will provide care. Care workers are generally low paid, unable to afford ‘affordable’ housing, but needing low rent or shared ownership, i.e. social housing. There is already a shortage of care workers in the district. The congestion on the roads in the town already make NW an unattractive place to visit. It is vital that the link road from the Cromer Road to the existing industrial estate via Link Road is put in place before there is any development. This will need public investment. As NW is the largest town in the District, raising a substantial amount in Council tax, it deserves to see a return in public investment in the town. If the local authority invested per head of population in North Walsham at the same level as they have for industry at Egmere, Itteringham Community shop or Cromer indoor tennis facilities, this would cover the link road. • The link road is viable, plans were in place when I was a member of the authority over 30 years ago, it is shameful that this vital infrastructure has been neglected resulting in the loss of industry, employment and unacceptable risks for pedestrians and cyclists on Aylsham Road. • The link road will allow the industrial estate to expand creating local employment. • Commuters will not shop locally, the plan needs to encourage people to live, work, and shop locally. Whilst acknowledging that the plan is to address housing need, housing cannot be considered in isolation. We need to build communities not just houses.
DS15	NW62	Jones, Mr Tony (1217025)	LP290	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NW62 represents a significant expansion of the town. Notwithstanding the rail service to North Walsham, transport links remain poor. It is inevitable that a large proportion of new inhabitants of the town will work elsewhere, it's therefore imperative that NNDC works with Norfolk County Council to improve public transport links so that the expanded population can make sustainable transport choices. Larger trains are delivering increased capacity now, but the current hourly train frequency ensures that travelling to Norwich by rail is less attractive than it could be. A half hourly frequency would enable more flexible travelling, and will be crucial to providing an attractive service for regular travellers. The current hourly service is unattractive now, and will be unfit for purpose if/when the western extension is built out. My focus here is rail, but quality walking cycling links in the town will be necessary to support growth. NNDC should ensure that design of new developments is masterplanned to support residents making environmentally sustainable transport choices. This is too important to be left to the developers alone. There is an opportunity here to deliver imaginative, high quality development which is not focussed solely around the car.

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DS15	NW62	Macey, Mr Henry (1216502)	LP196	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I agree in principle but the scale of proposed development is far too large. Dependent on good infrastructure. The new road would clearly be paid for by the developers and needs to be in place first which it can't! Re: 16.5 Vulnerability of the town centre is serious. Parking must be addressed - not just quantity but layout (presently badly designed). What happened to the proposed enlargement of the station car-park. Potential congestion must be addressed; new residents will not walk into town so must park. Sort the Grammar School roundabout/King's Arms St junction where NCC caused congestion by taking out a lane; this gets worse.
DS15	NW62	Mann, Mr Bernard (1218500)	LP808	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Horror and Outrage that you can even think of allowing such a large scale proposal as this without any thought as to how the village of Coltishall is going to cope the extra burden of at least 2000 extra car journeys per day. Everybody living on the North Walsham and adjoining roads already state that the situation is already a nightmare and that High Street was NEVER intended to take such volumes of traffic. Since the NDR has been in operation the volume of traffic through Coltishall has Significantly increased due to the fact that people living the coastal side of Wroxham find it easier to travel through Coltishall rather than queue for over a mile to get through the village when leaving Norwich. Before any future developments are even considered Thought & Action must be given to a relief road or Bypass. Has any thought been given to the amount of extra pollution that will be generated in our village? YOU have a duty to ensure that our future inhabitants are not choked to death by traffic that should not be going through the village. Get your priorities right, put the correct infrastructure in place Before any more developments are allowed. Why does it take the general public to see the forthcoming problems before the people in "power" can see them or are their eyes and ears closed ? I am fed up seeing and listening to people saying " We must learn from this" after a mistake has been made and highlighted
DS15	NW62	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	It is our view that the level of development which is proposed for North Walsham would impose very considerable strain upon our town. In order to sustain such a level of development we have needs which must be addressed by the Plan. This submission seeks to specify those needs. Throughout this submission we have made comments which have relevance to Policy DS 15. We believe that any extension to our town should be a model of green development, designed in accordance with the North Norfolk Design Guide and an enhancement to the well being and prosperity of North Walsham as a whole. What Changes Are You Seeking? 1. We are seeking a western extension link road which joins the Norwich Road to North Norfolk District Council's industrial estate. We consider that a road which merely links the Norwich Road to the Cromer Road will be inadequate both to the needs of our residents and to the needs of businesses on the industrial estate. 2. We are seeking - as we have noted elsewhere - an increase in the percentage of social rented housing to be made available on this and other residential sites allocated in North Walsham. 3. We note that while Policy DS 15 makes reference to the need for the 'mitigation' of highways impact, there is no mention of a comprehensive traffic impact study for the town as a whole. We are seeking such a study. 4. As we have argued elsewhere, if the proposed development is to enhance the health and well being of the town then there must be imaginative provision for a green infrastructure which links the development to nearby countryside and to the town centre. 5. We are seeking a thorough study of the impact of this development upon the health of both the new and the existing residents of North Walsham and a complete understanding of how their identified needs would be met.

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					<p>We would expect this to include additional medical and community facilities. 6. As we have argued in relation to Policy DS 14, we would expect to see evidence of sufficient capacity in electricity and telecommunications to support the needs of the residents of the proposed site. 7. We are seeking the provision of a new Primary School for North Walsham, accessible from the western extension link road and green infrastructure routes.</p> <p>Have the chance to create a model of green development in North Walsham, a well designed, pleasing and energy efficient community, well integrated into our town. Would be an enhancement of our prosperity and attraction. But our abiding concern is that without the infrastructure to which we have alluded these things will never be achieved.</p>
DS15	NW62	Morey, Mr Philip (1210409)	LP045	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I understand That only a large scale development will enable developers to provide infrastructure but how often have they promised doctors' surgeries, schools, community halls etc only to renege on their commitments claiming financial restrictions as has happened on the Norwich Road site where affordable homes have been scrapped? Why is it not possible for the larger brownfield sites to be developed (thus removing local eyesores) and the developers pay a premium to the council so that the council can invest in improving infrastructures? That way much of the land west of North Walsham will not be needed for housing and the council can be held responsible for infrastructure improvements rather than an unaccountable private developer. As for the traffic problems, I am sure every local resident has been snarled up, sometimes for lengthy periods, as buses outside the post office create chaos and huge tailbacks through the town centre. This can only get worse with more houses and is an issue that needs to be tackled before any more homes are built, no matter where. And already considerable problem of trying to get a doctor's appointment.</p>
DS15	NW62	Mortimer (1210197)	LP076	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Surely NO building should happen on open fields until ALL brownfield sites and empty spaces above shops and offices have been used? This type of proposal seems short-sighted and environmentally bad. It should not be the job of North Walsham (or Norfolk as a whole) to be providing homes that are affordable only to those moving here from the South East. This could allow young people onto the property ladder, and allow older people somewhere to down-size to when they were ready.</p>
DS15	NW62	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Large developments of the kind proposed are often overcrowded, designed around car use, lacking in infrastructure and with a stark absence of genuinely affordable homes. How will such a large site be integrated into the town? Where will people work, go to school, socialise, etc? It sounds like another dormitory development for people working in Norwich/outside the area, or retiring here from outside the region. I fully support those many local residents in the town whose homes will look out onto this proposed development, and be severely impacted by it. If it is to go ahead, I would therefore suggest as a minimum the inclusion of 'buffer' strips between existing homes and new properties, consisting of carefully planned areas of trees (which should not be placed so as to shade existing gardens/homes) and open grassland to provide habitat/green areas which would improve the landscape, give screening, and also help to compensate for polluted air from the new link road. On a positive note, the development itself could be a flagship for sustainability and include good sized areas of trees, green space, wildlife corridors and public gardens. Properties should not be allowed to be purchased as second homes. Far more should be done to lessen the environmental impact of the proposed</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					developments. Rather than a faceless sprawl of uniform properties built by 1-3 companies as mentioned within the proposal (we can guess which these will be), of which there are so many already, it should be an opportunity to build new properties which are integrated with the landscape, low on energy consumption and waste, and are built from environmentally friendly materials, and for ecological sustainability. Planting of trees, provision of cycle lanes, facilities for electric cars, footpaths and green open spaces should be given a priority. If it is to happen, this development could be a flagship for our region, a positive element benefitting the town and encouraging visitors.
DS15	NW62	Rayner, Mr Andrew (1217466)	LP635	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Scale of development:-The western extension would add a major increase to the size of the town and population. It results in the loss of substantial areas of greenspace, farmland and natural habitat for wildlife and quiet areas for walking etc. The overall density of the western edge would be massively increased to the detriment of existing residents who enjoy a semi rural environment. There is also the issue of the impact of such a large development on outlying roads and towns. for example, the resulting vehicular movements to the coast and towards Norwich. For example Coltishall and Wroxham bridges will be impacted upon. I fear the development on such a scale will be largely controlled by developers who have shown time and time again that they have no interest in the area other than profit and will do all they can to renege on any social contribution negotiated.</p> <p>Link Road: I note the link Road is proposed in order to address heavy lorry access through the Town. However it seems that it will simply move the problem to those existing residents in the area of the extension zone and the new housing developments. Presumably any new residential roads will filter of the new link road. There should be no motorised vehicle access from the new development, nor a spur off the link road, onto Skeyton Road. Otherwise this would result in a totally unacceptable level of harm to the amenity and quiet enjoyment existing residents. In addition the traffic problems experienced in the Station Road area will not be addressed due to increased vehicle movement from the new developments. Climate issue:-Given the worldwide concern over the impact of human activity on the planet are such road developments sustainable? Instead should we not be looking at reducing the size of vehicles of local roads so they can pass under existing bridges. Vehicle weights should be decreased to prevent damage to existing unsuitable narrow roads. Use of cars should be discouraged but given the distance from the development into town it can be anticipated that car use will take precedence over walking and cycling.</p>
DS15	NW62	Rose, Mr Alan (1217227)	LP577 LP821	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Housing development in North Walsham could mean a new link road running between the Norwich and Cromer Roads, hopefully then extended on into the industrial estate, which will cut traffic in the town and move tall lorries away from the bridges, alleviating the problems on Aylsham Road and the regular strikes on the Cromer Road bridge. The bypass will facilitate significant benefits both real and potential.</p> <p>It would also need new schools and GP services and maybe even an upgrade for the Cottage Hospital. There would be more people using the train and new jobs and businesses might come into the town. We need to make sure we have the infrastructure and services to be able to cope with an increase in housing and population.</p> <p>Town infrastructure The increase in housing and businesses facilitated by the plan will need key infrastructure</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					improving within the town. 1. Schools - additional primary and secondary education places will need to be identified through expansion of existing schools or building of additional ones. 2. Sewage/drains - The town has always had issues with drainage that in extreme weather has caused significant flooding. Expansion will need to include plans for this and development before building new houses. 3. Medical - Doctors surgeries are already at breaking point so additional services potentially on the site of the Memorial hospital are required, again before the building of the houses
DS15	NW62	Scott, Mr Lawrence ()	LP020	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree that North Walsham needs this expansion and note you have put in the supporting infrastructure. The new link road, extra primary school. The new link road will be built to gain access to the proposed building areas. I am still concerned that the high sider route is still going through the centre of North Walsham. I understand that the bridge over the railway is suitable to carry LGV's. In my opinion this will not need widening, but instead use smart lights to control traffic. Bradfield Road and Lyngate Road will need widening and junction improvements. The benefits of this will be to pull the high sider LGV from the centre of town. This making it safer for pedestrians and buildings (Reduced vibration) all round. This will allow LGV's direct access to Folgate Road industry park.
DS15	NW62	Smith, Mr Matthew (1209593)	LP002	Support	I support the need to grow and develop and believe that a Local Plan in the best way forward. What needs to happen is Section 106 funding must come to North Walsham (and other NNDC towns) first and work must be undertaken to improve infrastructure before homes are signed off/sold. In particular school places and access to quality play park provision are vital for the youngsters in the town. Local charities such as North Walsham Play are best placed to support with this going forward. Please do give this suitable consideration.
DS15	NW62	Tuff, Mr Roy (1215889)	LP731	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY In response to the vision set out in paragraph 5.17 - Sadly, we are three years into the Plan and are going backwards – there are no NHS Dental Spaces available, even on the Waiting List – one friend who has moved from Cromer needed to stay with her Dentist in Cromer as she couldn't switch. Doctors are problematic – the standard Waiting Time is now three weeks. Primary Schools are splitting Siblings – one at Manor Road, the other at Millfield – there are also splitting friends who were together at Infant School. There is increasingly heavy Traffic through the Town, and it is grid-locked at certain times of the day. The general consensus at a meeting held by the Town Council is that there should be no further development until the Infrastructure is sorted – I fully concur with this. I would welcome more Housing once the appropriate Infrastructure is available. It would be good to have sufficient Social Housing for those on the Waiting List, and Affordable Housing for Young People. I would also wish that the Western Link Road to extend over the Railway Line to eventually allow access to the Industrial Estate. It would also be useful to see the 20 mph area on Aylsham Road extended further out of Town. Final comment – there is mention of our Ageing Population and also the Economic Contribution of Younger People – we should also remember the Volunteering Contribution made by many of our Retirees.
DS15	NW62	Ward, Mr Nigel (1210625)	LP072	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: A travesty if land owners are allowed to sell there prime agriculture land for building 2000 plus homes. Agricultural Land should be protected at all costs along with our

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					wildlife and their habitation. Large developments have had direct negative impact for North Walsham residents such as major tail backs of traffic in the town centre grid locked during school runs twice daily. The pollution is awful and 4000 more cars from the proposed development is a danger to our children along with the added risks of the extra traffic I though there was a climate environmental emergency so NNDC has said. No funding or costings to light Taking a chunk out of weavers way to put a link rd shame on NNDC as our children use Weavers Way. No Council Houses and we know as previous developments in the town that developers promise the earth and have never delivered as NNDC cannot force Developers to do what they have said they will do. No infrastructure No Morals and it appears our opinions are just a formality as from my recent visit to an event Road Show in North Walsham Hosted by NNDC its going through. I can say not if the people of North Walsham have anything to say about it we will jut vote the council out at the next election. As I own a small business its common sense to put and build the infrastructure in first before any houses are built but it seems NNDC does not understand business models!!! Sort the disaster of Coltishall out first before any further developments Coltishall bridge cannot take any more Buses, HGVs, vans, and cars as its always tailed back as only 1 lorry and nothing else can get over the bridge Do Not build on either side of Weavers Way it will destroy our Countryside. Build on carters fields that way a much smaller development that can access the main North Walsham to Norwich rd with out a link going through Countryside. TWO of the largest hauliers in North Walsham would not use any link rd as it would take them 2 miles longer to get to Yarmouth Rd and would be pushing HGV's through the new Link Rd down Mundesley Rd Use Brown field sites
S15	NW62	Willer, Mrs Jill (1210911)	LP099	Object	I have seen many changes and developments in and around the town. I truly believe that the town has almost reached it's capacity and any new builds should be limited to brown field sites. The number of new builds suggested needs to be scaled down. 2000 plus is unrealistic. We have just had new house builds on the Norwich Road, putting an extra strain on our doctors surgeries, dentists, drainage, water supply and the national grid. How would they cope with the population of another 2000 dwellings? The NHS dentists in the town are no longer taking on new clients, we cannot obtain new doctors due to the work overload and stress of it all! A population increase means more cars commuting to schools. There is suggestion of a new primary school but what of the strain on the high school and college? The town network cannot cope with all the extra traffic. To suggest an increase to the industrial estate with extra units as a solution to the lack of jobs in the town is ridiculous. The days of high employment in the town are long gone with the major employers of the 1970's and 1980's. We will have more houses than ever but less jobs than past times. One of the reasons for Crane Fruehauf closure was because of the poor road network to North Walsham and this has not improved since the closure, 20 years ago. Why not build between Norwich City limits and the NDR first. People need work and the vast majority of jobs are in Norwich. People already commuting between North Walsham and Norwich do not have a good road network (B road). It is immensely busy. More cars would put a strain on this. What about the nature habitat. There are 17 species of bees regionally extinct, 25 types threatened and 31 conservation concern. We will not be able to survive in the future without them and nature. This proposal would see North Walsham expanding out of control over beautiful countryside. With the running out of oil for artificial fertilizers, our future generation will need the land to go back to organic growing in order to feed the population, instead of intense farming. They will need the green belt land that this proposed plan will take. Why should people who have

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					already made there homes in North Walsham, especially on the west side, have to put up with all this disturbance and destruction over many years.
DS15	NW62	Witham, Mr I M (1216498)	LP204	Object	Massive and disproportionate over-development of North Walsham. Targeting North Walsham to take so much of the bulk of the housing target, together with a disproportionately high density of growth villages in the surrounding part of the district, represents a poor attempt at forward planning, likely to have an unfairly detrimental impact on the geography of that part of the district, and quality of life of existing residents. A more modest growth allocation for North Walsham, over the plan period, with a greater emphasis on previously developed land, as priority over the greenfield development of surrounding farmland/countryside.
DS15	NW62	Woodhouse, Ms Jan (1210825)	LP091	General Comments	Attention needed to pedestrian access/facilities in order to link new development and existing houses in Greens Road area with the town centre.

Individuals	Number Received	Summary of Responses (Site Policy DS15)
Summary of Objections	10	A number of objections raise concern over the potential impact on the environment; the loss of a large area of greenspace / agricultural land, adverse landscape impact, impact on public footpaths including Weavers Way and wildlife and biodiversity impact. There needs to be an approach to local planning that addresses the Climate Emergency. Suggest that the scheme should include cycleways, a commitment to carbon offsetting, use of renewable technology, rainwater harvesting, electric car charging points, passivhaus/ carbon neutral homes. Need for social housing. One comments that this would create a commuter town rather than local employment and will increase rather than reduce the carbon footprint. Potential impact on the site of the 1381 Battle of North Walsham, significant in local and social history. Many raise concern over the infrastructure; existing issues with traffic, pollution, safety concerns on Aylsham road. Vital infrastructure has been neglected resulting in the loss of industry in the town. How Coltishall is going to deal with the extra cars. Some acknowledge that there is a need for a link road, to remove HGV's from local streets but consider it necessary to extend it to the industrial estate and to ensure that it is in place before development commences. How will it be funded and will it actually be used, problems along Station Rd and Mundesley Rd might not be addressed. No access should be available from development onto Skeyton Road. Concern that development could result in the loss of amenity for local residents. Concern about capacity of healthcare, schools, refuse collection, drainage, water supply, national grid, policing, buses etc. Need Social housing in North Walsham. Suggestions that other locations such as on the outskirts of Norwich would be favourable over this site and consider the town has reached capacity. One proposes a new alternative site, perceived to more suitable, having less impact on the natural environment and suggests that it should be compulsory purchased.
Summary of Support	5	Agrees that North Walsham needs an expansion and supports the link road between Norwich Rd and Cromer Rd but would need to extend onto the industrial estate. Otherwise high vehicles will still go through town centre. Existing road infrastructure is unsuitable and there are a lack of pedestrian and cycle routes. Would require an increase in public amenities, access to quality play park provision is vital. Section 106 funding must come to North Walsham before houses are signed off. B1145 improvements required. Questions the suitability of the link road and suggests that rerouting the A149 would be desirable. Concerns over traffic. Improvements needed to the railway station and suggestions that the town centre should become a Conservation Redevelopment Zone and be pedestrianised.

<p>Summary of General Comments</p>	<p>12</p>	<p>Agree in principal. This provides an opportunity to build green and sustainable buildings and be a flagship site for sustainability. No development should be built until infrastructure is in place. The new link road will provide opportunities for industry and businesses and opens town to growth and address current traffic issues. However others feel that the road will only stop certain amount of traffic and push more vehicles along Norwich Rd. Need to ensure the road extends over the railway line to allow access to the industrial estate and need to improve public transport links and pedestrian links. There is a lack of employment opportunities. Concerns over parking and the impact on the town centre and impact on amenity of existing residents. Will result in the loss of agricultural land. Need to provide buffers and open grassland. Some concerns over additional pressure on school, healthcare capacity and drainage. Suggestions that other sites should be prioritised first, including brownfield sites, and as part of existing development. Seek an increase in percentage of social rented housing on this site. Seeking a comprehensive traffic impact study for the town as a whole. Must provide GI. Seeking a study of the impact of the development upon health on residents and how there need will be met. Evidence that there is sufficient capacity in electricity and telecommunications.</p>
<p>Overall Summary</p>		<p>Some support for the expansion of North Walsham acknowledging the need for a link road (extending to the industrial estate) but questions how it will be funded, if it will actually be used and if it will resolve current issues on Station Rd and Mundesley Rd. Concern that North Walsham lacks the infrastructure necessary to accommodate growth. Existing traffic issues in the town and a lack of pedestrian and cycle routes. Concerns over parking, the impact on the town centre and impact on amenity of existing residents. Lack of employment opportunities. Concerns over the potential impact on the environment; loss of a large area of greenspace / agricultural land, adverse landscape impact, impact on wildlife and biodiversity and Weavers Way, impact on the site of the 1381 Battle of North Walsham. There needs to be an approach to local planning that addresses the Climate Emergency and a number of suggestions made to offset carbon in the development. Concern about capacity of healthcare, schools, refuse collection, drainage, water supply, national grid, policing, buses etc. Need for social housing. Would require an increase in public amenities, access to quality play park provision is vital. Section 106 funding must come to North Walsham before houses are signed off. B1145 improvements required and no access should be available from development onto Skeyton Road. Need to provide buffers and open grassland. Suggestions that other sites should be prioritised first, including brownfield sites, and as part of existing development. Improvements needed to the railway station and suggestions that the town centre should become a Conservation Redevelopment Zone and be pedestrianised. Seek a comprehensive traffic impact study for the town as a whole, a study of the impact of the development upon health on residents and how there need will be met and evidence that there is sufficient capacity in electricity and telecommunications.</p>
<p>Council's Response</p>		<p>Comments noted. Consider comments in the finalisation of the policy. The Council is taking the Strategic Urban extension forward through a collaborative approach, recognises the need for a co-ordinated infrastructure delivery including the importance of improving access to the industrial site and has set up a delivery group to manage the delivery and supporting evidence through the production of a comprehensive Development Brief to inform the delivery of this strategically important growth which reports to the Local Plan Working Party. The Council has used current evidence base and engaged with relevant bodies including Highways and infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan. Evidence with regards to capacity of electricity in the town has been commissioned. The Council has committed to the development of a development brief in partnership and will be subject to wider engagement and will include the requirement to accord to the Health protocol and for a 'Health Impact Assessment' of the healthcare impacts arising from the proposed development and a strategy to deliver the essential highway infrastructure and mitigation arising from the proposed development. Heritage considerations including the potential impact of development on archaeological sites have been taken into account and helps inform the extent of the site, including consideration by Historic Environment. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and geodiversity and continue to work with site promoters to take into account biodiversity and geodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact. Landscape and settlement considerations including the potential impact of development on landscape and views, the scale of</p>

		development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account.
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DS16: Land at Cornish Way

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS16	E10	Mooney, Mr Raymond (1210675)	LP080, LP113	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Having this will lead to the creation of a developer lead satellite commuter dormitory estate. The lack of increased infrastructure because the local economy would not be local there would be a vacuum to encourage the development of a vibrant, sustainable local new community. 1. The wording (including possible provision for a connection to a future access road from the south west (Bradfield Road)) is quite simply unacceptable. This should be done before anything else in order that the supply chain businesses that will service the Vatten Field wind farm would find North Walsham a viable location to locate to. This would bring high skilled, well paid jobs in green energy technologies to North Walsham with training opportunities for our youth and increased economic activity with in North Walsham. It would increase local employment, make living and working in North Walsham sustainable and reduce the amount of commuting there by reducing pollution from car journeys .Before development commences, funds from all available sources must be sort, in order that this vital part of infrastructure is in place before any further development commences. Amend policy DS16 part 1 by removing the word 'possible'
DS16	E10	Members for North Walsham Gay, Cllr Virginia (1218558)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We believe that the allocation of further employment land would be of advantage to North Walsham. We have suffered from a lack of contemporary office space in North Walsham as well as an inadequate road infrastructure. It is important that in allocating this site these things are taken into account. We would expect to see provision for a road a western extension link road serving this and other sites as we have stated at more than one point in this submission. We note that reference is made to the possible provision of such a road but we would maintain that without such a road this allocation will not attract businesses to the site.

Individuals	Number Received	Summary of Responses (Site Policy DS16)
Summary of Objections	1	The proposal received one objection. Concerns that North Walsham lack the infrastructure necessary to accommodate growth and improvements, including a road connecting to Bradfield Road, should be provided before development starts. This would help to encourage businesses, such as those serving the wind farms, to locate in North Walsham. Bringing high skilled, well paid jobs to North Walsham and improving the economy. Concern that this could turn into a dormitory commuter estate. By encouraging the development of a vibrant, sustainable local new community would help to reduce commuting and car journeys.
Summary of Support	0	None received
Summary of General Comments	1	One comment received, support further employment land in North Walsham, have suffered from a lack of contemporary office space as well as in an inadequate road infrastructure. Expect to see a road linking to the Western extension, to attract businesses.
Overall Summary		Limited comments received on this policy. No substantive issues raised. Support for further employment land in North Walsham, concern that North Walsham lacks the infrastructure necessary to accommodate growth and improvements, including a road connecting to Bradfield Road, should be provided before development starts. This would help to encourage businesses, such as those serving the wind farms, to locate in North Walsham. Bringing high skilled, well paid jobs to North Walsham and improving the economy. Concern that this could turn into a dormitory

		commuter estate. By encouraging the development of a vibrant, sustainable local new community would help to reduce commuting and car journeys. Lack of contemporary office space available.
Council's Response		Noted. Support welcomed for further employment Land. There is a need to ensure communities remain sustainable and viable for future prosperity. The Council is taking the Strategic Urban extension forward through a collaborative approach, recognises the need for a co-ordinated infrastructure delivery including the importance of improving access to the industrial site and has set up a delivery group to manage the delivery and supporting evidence for the delivery of this strategically important growth.

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Proposals for Sheringham

DS17: Land Adjoining Seaview Crescent

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS17	SH04	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS17)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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DS18: Former Allotments, Weybourne Road, Adjacent to Splash

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS18	SH07	Hay-Smith, Mr Clive Alflett, Mr James (Agent) (1217382 1217379)	LP536	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support DS 18. The site is entirely deliverable (in line with the NPPF), and capable of making a significant contribution towards satisfying the Council’s housing needs during the plan period to 2036. This rep demonstrates suitability, achievability, viability, and availability for allocation. The site should be considered in the broadest sense of residential development; including the flexibility for potential future uses of extra care facilities on the site. To provide sufficient flexibility in the policy approach which could help towards meeting the unmet demand for extra care bed spaces in the District. The site is entirely suitable for development, and there are no site-specific constraints which cannot be appropriately mitigated (such as the landscape and visual impact). The site is located within the Settlement Boundary of Sheringham. The site is suitable and can be delivered in accordance with the proposed policy requirements of points 1 – 5 within DS18. Landscape and Visual Impact point 1 of DS18 stipulates the need to provide ‘careful attention to site layout, building heights and materials in order to minimise the visual impact of development’. Further to this, point 2 seeks the provision of landscaping along the Weybourne Road site frontage. Sheils Flynn have prepared a Landscape and Visual Appraisal of the site. This Appraisal considers the Zone of Theoretical Visibility (ZTV) for the site, based on the potential of 2 storey residential development on the site. From the visual receptor of motorists travelling towards the site along the A149, it is concluded that there is good scope to mitigate changes in views along the road. From the summit of Franklin Hill, a popular viewpoint for walkers, it is recognised that views of the site are almost entirely screened by existing trees. It confirmed that development would not be visible from Sheringham Park, with no impacts on the landscape setting of Sheringham Park. Turning to Landscape Value, whilst it is recognised that the site forms part of a valued part of the landscape setting to Sheringham, it also outlines how the condition and character of the site’s immediate character is relatively degraded. The Appraisal confirms that the creation of a high-quality development that is structured to retain and strengthen key aspects of the landscape character will reinforce local identity and sense of place. It is important to acknowledge PF/18/1435 on the adjacent Splash Leisure Centre site, which is currently under construction. When considering the landscape and visual impact of any development on this site, this needs to be set within the context of the contribution adjacent developments make to the landscape character and visual impact of the locality. Utilities Points 3 and 4 of the proposed wording of Policy DS 18 outlines that any proposal may need to provide enhancements to the foul sewerage network, and that off-site mains reinforcements are required. As part of any application for the site, a Utilities Report will be provided, which will assess the capacity of required utilities to serve the site. Enhancements to both the foul sewerage network, and off-site mains reinforcement will be provided as part of developing the site, where this is required. Surface Water Runoff Under the proposed wording of Policy DS 18, point 5 states that development needs to provide ‘appropriate measures for dealing with surface water runoff’. Infiltration tests conducted on site demonstrate that the ground conditions (i.e. sands and gravels) are suitable for infiltration systems, but additional infiltration tests would be required to test for sufficiently permeable soils. Accordingly, this recognises the suitability of the site to provide appropriate measures for dealing with surface water runoff. Layout in Relation to Pumping Station Point 6 of the proposed policy wording for Policy DS 18 stipulates that any development proposal should be set back from the north-eastern boundary, to avoid encroachment to the pumping station. Initial preliminary site layout sketches have confirmed that it is fully achievable to design development on the site in a manner which ensures that it does not encroach on the pumping station. Deliverability Through ongoing marketing of the site, a range of interest has been received from a variety of developers. Accordingly, this demonstrates that there</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>is market demand and interest in the site; thus suggesting that there is a realistic prospect that the site will be delivered within the first five years of the plan period, in accordance with the NPPF. Achievable Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of residential development on the identified Policy DS 18 proposed allocation site. Therefore, residential development on the site is deemed to be entirely achievable. Viable Development of the site for residential purposes is considered viable, taking into consideration the various policy requirements in relation to matters such as affordable housing provision. Further evidence on viability can be provided, should this be deemed necessary at the application stage. Summary Sheringham is a highly sustainable location for growth, benefitting from a range of services and amenities. Furthermore, the sustainability of Sheringham is enhanced through the availability of sustainable transport methods, including the train line, which provides a direct rail connection to Norwich, West Runton, Cromer, North Walsham, Hoveton, Wroxham and Salhouse. As has been demonstrated, the site is suitable, available, achievable and viable, and is deliverable within the first five years of the plan period. There are no constraints which would affect the suitability of the site for residential development. Accordingly, the above text demonstrates that this specific site is a suitable location for further development, and Mr Clive Hay-Smith supports North Norfolk District Council's proposals to allocate the site under Policy DS 18 for residential development. Notwithstanding the above, it is acknowledged from the Council's own technical evidence which is informing its plan making process, that the land at Weybourne Road, Sheringham is suitable, available and deliverable for residential or employment development. Alternatively, a combination of the two, as a mixed use development.to provide sufficient flexibility and make the most efficient use of land, as required by the NPPF, the wording of Policy DS 18 should be changed so not to impose an artificial maximum, for 'at least 45 dwellings...'. Therefore, it is proposed that the first paragraph of Policy DS 18 is amended to include the following: "Land amounting to approximately 1.7 hectares is proposed to be allocated for development comprising of at least 45 dwellings (inclusive of affordable homes and self-build plots, public open space, associated on and off-site infrastructure, and potential extra care facility)."</p>

Individuals	Number Received	Summary of Responses (Site Policy DS18)
Summary of Objections	0	None received
Summary of Support	1	Support received from the Landowner who confirms that the site is suitable and there are no site-specific constraints which cannot be appropriately mitigated. A landscape and Visual Appraisal has been prepared. And a utilities report will be provided as part of any application. Enhancements to both the foul sewerage network, and off-site mains reinforcement will be provided as part of developing the site, where this is required. Infiltration tests conducted on site demonstrate that the ground conditions (i.e. sands and gravels) are suitable for infiltration systems, but additional infiltration tests would be required to test for sufficiently permeable soils. The site layout can be designed to ensure development does not encroach on the pumping station. The site is deliverable, capable of making a contribution towards satisfying the Council's housing needs during the plan period to 2036. But suggests that there should be flexibility for potential future uses of extra care facilities on the site, to help towards meeting the unmet demand for extra care bed spaces.

Summary of General Comments	0	None received
Overall Summary		Limited comments received on this policy. No substantive issues raised. Support received from the Landowner who confirms that the site is suitable and there are no site-specific constraints which cannot be appropriately mitigated. A landscape and Visual Appraisal has been prepared. And a utilities report will be provided as part of any application. Enhancements to both the foul sewerage network, and off-site mains reinforcement will be provided as part of developing the site, where this is required. Infiltration tests conducted on site demonstrate that the ground conditions (i.e. sands and gravels) are suitable for infiltration systems, but additional infiltration tests would be required to test for sufficiently permeable soils. The site layout can be designed to ensure development does not encroach on the pumping station. The site is deliverable, capable of making a contribution towards satisfying the Council's housing needs during the plan period to 2036. But suggests that there should be flexibility for potential future uses of extra care facilities on the site, to help towards meeting the unmet demand for extra care bed spaces.
Council's Response		Support welcomed. Further information on drainage, sewage, surface water and 'landscape and Visual Appraisal' submitted is welcomed and will be used to help finalise and support the policy approach. Welcome clarification on availability.

DS19: Land South of Butts Lane

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS19	SH18/1B	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS19)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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Proposals for Stalham

DS20: Land Adjacent Ingham Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS20	ST19/A	Elliot, Mrs Rachel (1210046)	LP024	Object	Stalham has 2 doctors surgeries, both of which seem to be full to capacity and the booking of appointments is near on impossible, how can further development be considered until the issue of services such as doctors be addressed. Please liaise with Norman Lamb as he is currently looking into this issue.
DS20	ST19/A	Stanton, Mr Garry (1218558)	LP017	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY • Should not be building in the countryside and should protect Grade 1 agricultural land.</p> <ul style="list-style-type: none"> • Ingham Road runs adjacent to Stalham High School is already congested at certain times of the day and this will add to accidents between vehicles and school children. • Nearest NHS dentist is 10 miles away • Lack of employment opportunities – people will travel to Norwich • An additional 70 properties in this area would also add to already stretched resources such as schools, healthcare, water resources and additional loading on the sewage treatment works. • What is meant by 'affordable homes' • This will add to Norwich commuter belt, inflating prices and squeezing families out of the area.

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Individuals	Number Received	Summary of Responses (Site Policy DS20)
Summary of Objections	2	Two objections received. Concern about capacity of healthcare, schools, water resources and sewage treatment works. Grade 1 agricultural land and countryside should be protected and shouldn't be built on. Concern over increased traffic and safety concerns. Lack of employment opportunities. This will add to Norwich commuter belt, inflating prices and squeezing families out of the area. Seeks clarification on what is meant by 'affordable homes'.
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary		Limited responses received. Concern about capacity of healthcare, schools, water resources and sewage treatment works and the loss of Grade 1 agricultural land and countryside. Consider that this should be protected and not built on. Concern over increased traffic and associated safety concerns. Lack of employment opportunities. This will add to Norwich commuter belt, inflating prices and squeezing families out of the area. Seeks clarification on what is meant by 'affordable homes'.
Council's Response		Noted. The Council has fully engaged with key service providers to identify the likely impacts of development for Children's services, health, local highways, water, and sewerage and energy networks. These issues along with wider constraints have been taken into account in site assessment. Affordable housing is a general term which is used to describe a range of housing types such as affordable rent, shared ownership, shared equity and low cost home ownership properties where the purchase price of homes is discounted below open market values. Occupation is limited to those that are in housing need. Affordable housing is defined by central government. The full definition can be found in the National Planning Policy Framework.

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

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS21	ST23/2	Noble, Dr Michael (1210275)	LP123	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Previously, part of area ST23/2 had planning permission for industrial units. I was told at the recent event at Stalham Town Hall that this has been changed so that it can now be used for residential development instead. This is contrary to the aims of the Local Plan which seeks to increase local employment opportunities. This promise should be kept. Please consult with local service providers such as surgeries and schools to gain a realistic view of the impact of further increasing the local population. Please consider how this land can be better utilised to add to services for existing residents, such as local employment opportunities and green spaces for the benefit of the whole community.
DS21	ST23/2	Elliot, Mrs Rachel (1218558)	LP024	Object	Stalham has 2 doctors surgeries, both of which seem to be full to capacity and the booking of appointments is near on impossible, how can further development be considered until the issue of services such as doctors be addressed. A review of the usage of the doctors surgeries and plans put in place to review their capacity and parking spaces at the surgeries.
DS21	ST23/2	Stanton, Mr Garry (1209669)	LP018	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY • Should not be building in the countryside and should protect Grade 1 agricultural land. <ul style="list-style-type: none"> • Yarmouth Road is already congested at certain times of the day and this will add to accidents between vehicles and school children. • Nearest NHS dentist is 10 miles away • Lack of employment opportunities – people will travel to Norwich • An additional 70 properties in this area would also add to already stretched resources such as schools, healthcare, water resources and additional loading on the sewage treatment works. • What is meant by ‘affordable homes’ • This will add to Norwich commuter belt, inflating prices and squeezing families out of the area.

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Individuals	Number Received	Summary of Responses (Site Policy DS21)
Summary of Objections	3	Three objections received. Members of the public express concern over the impact on the capacity of healthcare, schools, water resources and sewage treatment works. Loss of valuable agricultural land that should not be developed. Could create extra traffic and safety concerns. Lack of employment opportunities. Part of site has planning permission for employment which should be provided. Add to Norwich commuter belt, inflating prices and squeezing families out of the area.
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary		Limited responses received. Members of the public expressed concerns over the potential impact of development on this site on the capacity of healthcare, schools, water resources and sewage treatment works. Loss of valuable agricultural land that should not be developed. Could

		create extra traffic and safety concerns. Lack of employment opportunities. Part of site has planning permission for employment which should be provided. Add to Norwich commuter belt, inflating prices and squeezing families out of the area.
Council's Response		Noted. Consider comments in the finalisation of the policy. The Council has fully engaged with key service providers to identify the likely impacts of development for Children's services, health, local highways, water, and sewerage. These issues along with wider constraints have been taken into account in site assessment. The Council considers it important to retain some of the land for solely employment use and therefore the site is proposed for a mixed use scheme including residential, employment land and community/ commercial land. Part of the site consists of Grade 1 agricultural land, however the allocation would have minimal impact on the overall supply in the town.

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Proposals for Wells-next-the-Sea

DS22: Land at Market Lane

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS22	W01/1	Price, Ms Amanda (1210607)	LP071	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Market Lane is OK - but the whole affordable housing issue still applies
DS22	W01/1	Edwards, Mr John (1218558)	LP318, LP322	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. The Norfolk Coast AONB was designated in 1968 and includes the North Norfolk Heritage Coast, a continuous coastal strip from Holme-next-the-Sea to Weybourne. This coast is characterised by a wide variety of significant coastal deposition features, including salt and drained marshes and sand dunes. It is a coastline punctuated by small, ancient, compact and relatively quiet settlements with Wells at its centre, and has seen significant growth of active outdoor pursuits, side by side with peaceful tourism. A major feature running through the Heritage Coast is the Norfolk Coastal Path from which there are extensive and uninterrupted views of ‘where the sky meets the sea’ to the north and where the sky to the south meets the gentle landscape of the chalk land rising away from the coast.</p> <p>The statutory purposes of the AONB designation are to conserve and enhance the natural beauty while allowing for the sustainable development of the communities and economic activity in ways that enhance the character of the area.</p> <p>This is reinforced by the Countryside and Rights of Way Act 2000 which places a duty on public bodies to have regard to the purpose of conserving and enhancing the natural beauty; in this connection, the key to development in an AONB is that it must enhance the area.</p> <p>In addition, two non-statutory purposes recognise:</p> <ul style="list-style-type: none"> • The needs of agriculture and other rural industries, and of the economic and social needs of local communities by promoting sustainable forms of development that in themselves conserve and enhance the area’s natural beauty, and • The need for recreation in so far as this is consistent with conserving and enhancing the area’s natural beauty. <p>Insufficient weight has been given to the above in proposing to extend a settlement in a linear fashion along the coastline.</p> <p>Such linear development would compromise the essential and ancient relationship between the valuable coastal marsh environment and its heritage settlements established originally as compact and nucleated settlements around navigable inlets providing accessible waterfronts. It would additionally bring housing and its intrusions into proximity with valuable and protected bird habitats and territory and might, therefore, have a detrimental effect on their sustainability.</p>
DS22	W01/1	Cracknell, Mrs Lorraine (1217377)	LP420	Object	<p>Much further consideration needs to be made before considering the Mill Rd site as suitable</p> <p>~The other site above Staithe Place off Market Lane seems to serve the purpose well for social/affordable housing.</p> <p>~If this was a kept as a green field and the other site you have proposed as the new green area was used for affordable/ social housing opposite existing housing with exit onto Holkham/ Freeman St ~Is it not possible to look at smaller plots to meet the needs rather than one big site which has far more detrimental impact on Wells.</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS22	W01/1	Griffiths, Dr David (1210766)	LP081	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY Concerns regarding any significant new housing development at Wells-next-the-sea because of pressure on the existing infrastructure - especially roads and parking - and question whether the town has sufficient amenities to support. However, I do understand the basic requirements of the local plan and need for housing - and affordable housing in particular. I can see that the planning team have done a thorough evaluation and, given the various constraints and challenges, and on the assumption that any approved development is sensitive to the local environment and all basic infrastructure is part of any development, I agree that this site (W01/1) and the other preferred site, W07/1 are the most suitable for limited development that would have least adverse impact on the town, those living here and those visiting.
DS22	W01/1	Gates, Michael (1210794)	LP158	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY Affordable housing is needed in Wells. Very disappointing that the exception site has changed into development land.

Individuals	Number Received	Summary of Responses (Site Policy DS22)
Summary of Objections	3	Three objections received. Majority consider this to be a suitable site but affordable housing issue still applies. Concerns over the potential impact of development on the AONB, key to the future growth of the local economy. Linear development could comprise the valuable marsh environment and heritage of this settlement. Also potential impact on protected birds.
Summary of Support	2	Two comments of support, understands the need for housing especially affordable housing. Consider that this site would have the least adverse impact on the town. Raises concerns over significant housing developments due to the pressure on existing infrastructure and if there is sufficient amenities. Development should be sensitive to local environment and provide basic infrastructure. Disappointed that site would no longer be for solely affordable housing.
Summary of General Comments	0	None received
Overall Summary		Limited responses received. Majority consider this to be a suitable site for housing but expressed a preference for affordable housing. Some concerns over the potential impact of development on the AONB, key to the future growth of the local economy. Linear development could comprise the valuable marsh environment and heritage of this settlement. Potential impact on protected birds. Development should be sensitive to local environment and provide basic infrastructure.
Council's Response		Noted: Consider comments in the finalisation of the policy. Addressing ALL housing needs, including both market and affordable is an important consideration in meeting all identified housing needs across the district (both Local and District wide) and contributing to a balanced and sustainable community. The location of development in Wells has been informed by proximity to the designated sites on the marshes to the north of the town, the high quality of the landscape around the town and the potential impact on the AONB. Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement for the retention and enhancement of mature hedgerows and trees around the site. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for

biodiversity and geodiversity and continue to work with site promoters to take into account biodiversity and geodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact. The Parish Council is also developing its own neighbourhood plan and is currently understood to be assessing the level of additional local need to inform its own NP policies on additional growth to address local needs.

DS23: Land Adjacent Holkham Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS23	W07/1	Griffiths, Dr David (1210766)	LP082	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I am not seeking changes - simply to add my (conditional) support. Concerns regarding any significant new housing development at Wells-next-the-sea because of pressure on the existing infrastructure - especially roads and parking - and question whether the town has sufficient amenities to support. However, I do understand the basic requirements of the local plan and need for housing - and affordable housing in particular. I can see that the planning team have done a thorough evaluation and, given the various constraints and challenges, and on the assumption that any approved development is sensitive to the local environment and all basic infrastructure is part of any development, i agree that this site (W01/1) and the other preferred site, W07/1 are the most suitable for limited development that would have least adverse impact on the town, those living here and those visiting.
DS23	W07/1	Cracknell, Mrs Lorraine (1218558)	LP420	Object	<p>~The proposed site marked in red off Mill Rd is totally unsuitable when the points raised in your own documents are taken into consideration. This site seems to contradict every point you have stated.</p> <p>~The document states that 80 new homes are needed In Wells but only 28 of these would be affordable homes. It is social and affordable that is required due to the massive increase in recent years in the sale of property for second home use.</p> <p>~The Mill Rd site is an open green area as stated by you in a designated area of outstanding natural beauty and is presently used as a caravan club site and horse holiday liveries to support the last remaining farm in Wells. This business helps support the town with holiday trade. Whilst tourists are staying there they not taking up much needed car parking in town as obviously their vehicles are on the site.</p> <p>~This site in particular would have a huge impact to the green open spaces that you state you wish to keep as it can be seen all the way from the beach and would be detrimental to that view.</p> <p>~The flow of traffic along Mill Rd is horrendous already in the summer and this would only exasperate the problem so I fail to see why highways favour this above other sites.</p> <p>~With building there on the green area and on Market Lane would this not meet the 28 homes required? The other 52 homes that are said to be needed are only going to be sold as second homes as seen in the Staithe Place development.</p> <p>~Is it not possible to look at smaller plots to meet the needs rather than one big site which has far more detrimental impact on Wells</p> <p>Much further consideration needs to be made before considering the Mill Rd site as suitable~The other site above Staithe Place off Market Lane seems to serve the purpose well for social/affordable housing.</p> <p>~If this was a kept as a green field and the other site you have proposed as the new green area was used for affordable/ social housing opposite existing housing with exit onto Holkham/ Freeman St ~Is it not possible to look at smaller plots to meet the needs rather than one big site which has far more detrimental impact on Wells</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS23	W07/1	Wright, Miss Christie (1217325)	LP330	Object	This site should be removed - Concerns over: ~the economic impact of the development on the existing farm use and the impact on the town. ~access and impact on highways. ~visual impact and views ~potential for the homes to become 2nd homes ~capacity of local services
DS23	W07/1	Benson, Mr Roger Hill, Mrs Janet Wilson, Mr James (1216144 1216125 1218028)	LP169 LP163 LP675	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Delete this site from the list and use another area where social housing which is needed for Wells (good affordable rented accommodation) can be provided. Not a sustainable location. The development will damage the views of the town and countryside from the coast in one of the most important parts and well loved views in North Norfolk. Not appropriate for the AONB. Will be traffic problems caused by the additional traffic on Holkham Road and will impact on the European Protected wildlife sites by introducing more pressure from new residents which will not be addressed by a small area of open space. Will be entirely visible from and dominate a large stretch of the AONB which are given special mention in the NPPF - proposals which will significantly harm the special qualities of these areas should be rejected. Certainly this development will have significant, large scale and highly visually damaging impacts on the AONB. Quotes Para 172 of the NPPF. Additional pressure on the already overcrowded and increasingly damaged SPA, SSSIs, SAC and European Marine Site which are the highest nature conservation designations available, will be significant and will not be mitigated by the area of open space provided. Contrary to national and local planning policy. Impact on nocturnal 'dark skies' views in the area will be significant and damaging - this coastal strip is one of the few areas where the Northern Lights are visible in lowland Britain -and other wonderful night-time sky elements. Additional traffic generated on Holkham Road will be significant and damaging The Character of the Town - and particularly its western fringe and the adjacent coastal countryside will be significantly altered and damaged which will be contrary to the Policy ENV 2 in the Local Plan. Past experience has produced generic, ugly, uncharacteristic and unaffordable housing that has mostly gone to supply an insatiable 'second home' market which is unsustainable and unjustifiable in community development, local amenity value and economic development. Would require a massive amount of landscaping on the northern and western sides to buffer and screen the development from adjacent open views and landscapes - at least a 50m wide tree planting belt would be necessary as a minimum. Not be able to profit from a view over the coast / countryside, and no attempt to orientate or sell it on that basis should be made. If development were to be located on this site - Housing must be low level types not exceeding 1.5 stories in height to reduce the visual impacts. The ugly 2 - 3 story developments which have been proposed elsewhere in the area are not appropriate
DS23	W07/1	Price, Ms Amanda (1210607)	LP071	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Reconsideration of the amount of extra housing at wells Site is not big enough for 60 houses, and I would need to be very convinced about the pricing of these not to think they will all go into posh second home ownership and part-time occupancy with second lets (often not declared....) So this site needs further consideration, the alternatives are no better. Local proposals for allotment use as an alternative are unacceptable.
DS23	W07/1	Walsingham, Mrs Heather (1218475)	LP785	Object	The proposed plan W07/1 is on our right of way, please see the attached document clearly showing the right of way on picture 1, and our deeds clearly stating we have right of way with or without motor vehicle, (see hand registry document).

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS23	W07/1	Edwards, Mr John (1216139)	LP318, LP322	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Policy DS 23 be deleted and replaced by alternative sites. The Norfolk Coast AONB was designated in 1968 and includes the North Norfolk Heritage Coast, a continuous coastal strip from Holme-next-the-Sea to Weybourne.</p> <p>This coast is characterised by a wide variety of significant coastal deposition features, including salt and drained marshes and sand dunes. It is a coastline punctuated by small, ancient, compact and relatively quiet settlements with Wells at its centre, and has seen significant growth of active outdoor pursuits, side by side with peaceful tourism. A major feature running through the Heritage Coast is the Norfolk Coastal Path from which there are extensive and uninterrupted views of ‘where the sky meets the sea’ to the north and where the sky to the south meets the gentle landscape of the chalk land rising away from the coast.</p> <p>The statutory purposes of the AONB designation are to conserve and enhance the natural beauty while allowing for the sustainable development of the communities and economic activity in ways that enhance the character of the area.</p> <p>This is reinforced by the Countryside and Rights of Way Act 2000 which places a duty on public bodies to have regard to the purpose of conserving and enhancing the natural beauty; in this connection, the key to development in an AONB is that it must enhance the area.</p> <p>In addition, two non-statutory purposes recognise:</p> <ul style="list-style-type: none"> • The needs of agriculture and other rural industries, and of the economic and social needs of local communities by promoting sustainable forms of development that in themselves conserve and enhance the area’s natural beauty, and • The need for recreation in so far as this is consistent with conserving and enhancing the area’s natural beauty. <p>Insufficient weight has been given to the above in proposing to extend a settlement in a linear fashion along the coastline.</p> <p>Such linear development would compromise the essential and ancient relationship between the valuable coastal marsh environment and its heritage settlements established originally as compact and nucleated settlements around navigable inlets providing accessible waterfronts. It would additionally bring housing and its intrusions into proximity with valuable and protected bird habitats and territory and might, therefore, have a detrimental effect on their sustainability.</p>
DS23	W07/1	Edwards, Mr John (1216139)	LP319, LP322	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Policy DS 23 be deleted and replaced by alternative sites.</p> <ol style="list-style-type: none"> 1. A significantly prominent site, intrusively visible from the main features of the AONB, including the Norfolk Coastal Path; it is an integral part of the open landscape formed by the drained marshes and the rising coastal chalk ridge and represents a significant westward extension of the Wells townscape into the attractive rural landscape leading to Holkham and its parkland. It conflicts with Policies ENV 1 and ENV 2. 2. Existing development has provided a clear hard border to the Town, which has been maintained from the early part of last century, 3. The current ribbon of housing alongside the A149 dates from the 1930s and well before the designation of the AONB. The 19 houses are set at some distance back from the highly visible coastal chalk ridge and now blend in as a result of hedgerow and tree growth having reached maturity. This blending is seen from all coastal viewpoints; in fact the need to blend housing into the landscape was a material consideration in the determination of recent planning applications extending this Mill Road ribbon development. While noting that an intrusion exists, this is not a justification for making the position worse by consolidating it further with a major development which would be

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>visually and starkly intrusive and practically impossible to blend in, especially at the density proposed. The light pollution would have a major adverse impact on the highly valued dark coastal skies at night,</p> <p>4. The loss of the field would have a detrimental impact on the viability of Mill Farm and would be contrary to the purposes of the AONB,</p> <p>5. In moving westwards from the hard boundary formed by Westfield Avenue, the new boundary is arbitrary and apparently defined solely by the housing target. In reality, if the existing hard boundary is breached, there would be little justification for resisting further development as far as the former railway embankment, as the first clearly defined boundary,</p> <p>6. The single vehicular access from Mill Road would exacerbate, in summer, the traffic problems on the heavily used and often congested A149 Coast Road,</p> <p>7. In the event the development proceeds, full regard should be had to the loss of privacy incurred by the existing adjoining housing. Alternative Sites In resisting the development of WO 7 and given the housing target for Wells [accepted in this submission], it is necessary to identify alternative housing provision.</p> <p>The following are material considerations:</p> <ol style="list-style-type: none"> 1. Any housing development, with the exception of infill, brownfield and small scale special housing, should be behind the coastal ridge visible from the areas that justify the AONB, e.g. the marshes and dunes, 2. Developments should mostly be small to facilitate the provision of housing for rent and affordable permanent residency; this should be provided by appropriate bodies, including the community led housing association, 3. Development should form a coherent extension to the existing settlement and be sensitive to the existing townscape. As a consequence, it is suggested that there should be further investigation into: 1. The impact on the housing target of current infill and brownfield development opportunities, Policy DS 23 be deleted and replaced by alternative sites, particularly suitable for the provision of affordable housing as per Policy SD 2, and mainly for rent, for those working in Wells and district, and those seeking continued permanent residency. <p>The definition of OSP147, off Two Furlong Hill and Mill Road, as a single homogenous entity is inappropriate, as it is two distinct areas of Allotments and Paddocks. Development off two Furlong Hill would form a coherent contribution to the townscape.</p>
DS23	W07/1	Fullwood, Mr Tony (1217463)	LP587	Object	<p>Para 19.20 already acknowledges that the site is within the Norfolk Coast Area of Outstanding Natural Beauty and is reasonably prominent in the local landscape - particularly when viewed from the lower ground to the south and the site can be seen from the Beach Road causeway. However, the density of development proposed will not allow for sufficient landscaping to carefully integrate proposals within this sensitive environment. Nor do the policy criteria sufficiently emphasise the impact on this landscape of national importance. It cannot be right that the principle of access is not yet resolved and this issue should be rectified before the publication of the Reg 19 Local Plan. It would appear that the greatest conflict in relation to vehicular access would arise if the access were located on Freeman Street/ Holkham Road given other car parking and constraints along this road. Reduce capacity of Policy DS 23 Land Adjacent Holkham Road from 60 dwellings to 40 dwellings in order to allow sufficient landscaping within this sensitive location. Add 'landscaping' to criterion 1. Specify satisfactory vehicular access to the site within criterion 3. Amend criterion 5 to: retention and enhancement of mature hedgerows and trees around the site including provision of generous landscaping within the site and landscaping along the northern boundary of the housing; The brownfield site of the long-vacant former Ark Royal Public House, Freeman Street, Wells represents an amazing opportunity for</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					development to enhance the setting of the Conservation Area and this approach to the town, whilst providing additional facilities - including housing. It is important that the Local Plan focuses on brownfield opportunities in sustainable locations and this site should be investigated for allocation in the Local Plan.
DS23	W07/1	Wells, MS Judith (1217777)	LP665	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The area now proposed for housing at W07/1 is a relatively small site and I wonder how it could support sixty dwellings? The plan leaves half the existing area of horse paddocks. I do not know whether this reduced space is sufficient for Mill Farm to continue its business with visitors and their horses, or if the owner wishes to, but I am concerned that once part of the land has been built on, it would create a momentum to develop the remaining portion. (I note this appears to be the case with the recent development at Market Lane, W01/1.) As a resident of Bases Lane I am particularly aware of the narrowness of that road and Westfield Avenue. Both already suffer from a high level of on street parking and can only support one vehicle passing at a time. If even a part of the additional traffic that would be generated by 60 dwellings were routed onto either of these roads, I would have significant concerns for safety. For the most part Bases Lane has no pavement so pedestrians (often children and the elderly) have to avoid moving cars while walking past parked vehicles. As most households now have two cars, I believe the substantial additional traffic the new homes would bring must present an unacceptable risk to pedestrians. The narrowness of the entrance to Bases Lane from Park Road also regularly creates a situation where drivers who are seeking to enter Bases Lane must reverse into Park Road. They are forced to give way to eastbound vehicles that are seeking to exit Bases Lane past parked vehicles and thus occupy the whole of the available road space. This manoeuvre is potentially dangerous, particularly as the junction is on a 90 degree bend and the volume of tourist traffic around this bend can be substantial. Even a small amount of additional traffic along Bases Lane would worsen this situation. Despite what I imagine would be additional cost, it would be safer to route vehicular traffic generated by the new development onto either Mill Road or Holkham Road which are straight two-lane roads.

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Individuals	Number Received	Summary of Responses (Site Policy DS23)
Summary of Objections	8	Eight objections received. A number of concerns raised, mainly the potential impact on the environment and the AONB (alignment with paragraph 172 of NPPF). Concerns that development would be prominent, have detrimental impact on views, the countryside and coastal paths and could impact on character of the town. Insufficient space for landscaping. Potential adverse impact on designated sites from new residents, unable to be mitigated by open space. Western boundary is arbitrary and hard to resist further development. Damage dark skies and impact on wildlife. Other concerns; impact on the capacity of local services, the amenity of existing residents, the loss of a beneficial use and access concerns. Traffic impact, especially in summer. Suggest that a safer access route could be onto Mill Rd or Holkham Rd. Part of the land is in different ownership with the right of way. Affordable homes should be for local people and market housing should not be available for second homes. Concerns over the design of the development. Suggestions that a number of smaller sites would be more beneficial or this site should be for 40 dwellings rather than 60. Development should form a coherent extension to the existing settlement and be sensitive to the existing townscape. Would require large amount of landscaping and restrict housing to maximum height of 1.5 stories. Add 'landscaping' to criterion 1. Specify satisfactory vehicular access to the site within criterion 3. Amend criterion 5 to: retention and enhancement of mature hedgerows and trees around the site including provision of generous landscaping within the site and landscaping along the northern boundary of the housing.

Summary of Support	2	Two comments of support received. Understands the need for housing especially affordable housing. Consider that this site would have the least adverse impact on the town. Raises concerns over significant housing developments due to the pressure on existing infrastructure and suitability of the access road and the likelihood of the remaining section of the site being built once site is developed. Also whether there are sufficient amenities. Suggests that a safer access route would be onto Mill Rd or Holkham Rd. Development should be sensitive to local environment and provide basic infrastructure.
Summary of General Comments	0	None received
Overall Summary		A number of concerns raised, mainly the potential impact on the environment and the AONB (alignment with paragraph 172 of NPPF). Concerns that development would be prominent, have detrimental impact on views, the countryside and coastal paths and could impact on character of the town. Insufficient space for landscaping. Potential adverse impact on designated sites from new residents, unable to be mitigated by open space. Western boundary is arbitrary and hard to resist further development. Damage dark skies and impact on wildlife. Other concerns; impact on the capacity of local services, the amenity of existing residents, the loss of a beneficial use and access concerns. Traffic impact, especially in summer. Suggest that a safer access route could be onto Mill Rd or Holkham Rd. Part of the land is in different ownership with the right of way. Affordable homes should be for local people and market housing should not be available for second homes. Concerns over the design of the development. Suggestions that a number of smaller sites would be more beneficial or this site should be for 40 dwellings rather than 60. Development should form a coherent extension to the existing settlement and be sensitive to the existing townscape. Would require large amount of landscaping and restrict housing to maximum height of 1.5 stories. Add 'landscaping' to criterion 1. Specify satisfactory vehicular access to the site within criterion 3. Amend criterion 5 to: retention and enhancement of mature hedgerows and trees around the site including provision of generous landscaping within the site and landscaping along the northern boundary of the housing.
Council's Response		Noted: Consider comments in the development of the policy. The Local Plan is informed by a sustainability appraisal which reviews the key environmental, social and economic considerations that affect the District. Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape, views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A density of approximately 30 dwellings per hectare has been applied but it is considered that sites may not be suitable eg due to local character considerations, we have adjusted our assessment accordingly and this allows space for landscaping. The location of development in Wells has been informed by proximity to the designated sites on the marshes to the north of the town, the high quality of the landscape around the town and the potential impact on the AONB. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement for the careful attention to site layout, building heights and materials in order to minimise the visual impact of development. And the retention and enhancement of mature hedgerows and trees around the site including provision of landscaping along the northern boundary of the housing. Development proposals would need to comply with a number of policies (including those relating to affordable housing, open space, providing supporting infrastructure and design) elsewhere in the plan. Dark skies will be considered in line with Policy SD13 Pollution & Hazard Prevention & Minimisation, comments will be considered in the finalisation of this policy. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and continue to work with site promoters to take into account biodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact. The draft Plan has been subject to an Interim Habitat Regulation Assessment (HRA) with the purpose to assess the potential impacts on Natura 2000 or European Sites and if necessary specify any mitigation measures. The results can be found within the published HRA. A further Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (RAMS) is currently being commissioned collectively by the Norfolk Authorities and Natural England. Both of these studies will inform the next stages of plan making. The

Council has engaged with the County Highways Authority to ensure that highways impacts are manageable in terms of site access, road network considerations including suitability in relation to scale and potential cumulative impacts and potential mitigation measures. The Parish council is also developing its own neighbourhood plan and is currently understood to be assessing the level of additional local need to inform its own NP policies on additional growth to address local needs.

DRAFT

Proposals for Blakeney

DS24: Land East of Langham Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS24	BLA04/A	Albany, Mr Clive, Albany, Mrs Anne (1210593, 1216374)	LP176, LP177, LP178, LP191	Object Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Removal of BLA04/A as the preferred location for housing allocation in Blakeney. It is clear from site visits that allocation BLA04/A is not ‘reasonably well enclosed’ in the landscape (as referenced in the reasons for selection), but very prominent. - Views across the arable field from Langham Road to the east are very open due to the intermittent fragmented hedge on the east side of the road. In contrast, views to the west are less open due to a continuous hedgerow that provides a degrees of screening of recent development at Avocet View and further development opportunities to the west of Langham Road. The existing settlement edge is defined by a line of pines and other trees to the south of properties on Kingsway and deciduous woodland further to the east. These have taken c. 50 years to mature and provide the current screening benefits. These trees filter views of the properties on Kingsway, softening the urban edge of Blakeney. Development of land within BLA04/A would be highly conspicuous, introducing a hard edge to the settlement that would take a number of decades to soften with appropriate planting. This would have adverse landscape and visual effects from one of the main roads accessing Blakeney and footpaths to the south. Whilst the line of pines and other trees soften the urban edge of Blakeney, when viewed from the south, they would not screen views of development in BLA04/A from properties on Kingsway. - The development of allocation BLA04/A would have adverse effects on the setting of St Nicholas Church, which is currently seen above a wooded foreground and fields. - The Blakeney Draft Conservation Area Appraisal & Management Plan (August 2018) Section 8.3.6 sets out the need to appreciate heritage assets individually or collectively from key viewpoints that contribute to their special interest. - The footpath that links Langham Road to Saxlingham Road, and ultimately St Nicholas Church and Blakeney Primary School is a well-used route by dog walkers, local residents, ramblers and school children. The transient use of the path limits the effects on privacy compared to the more permanent intrusion of residential property. As such, the selection of the preferred site allocation should be reconsidered in favour of sites that are less conspicuous in the landscape, would have less of an impact on residential amenity, public footpaths and the setting of St Nicholas church. (See accompanying document). The existing Avocet Way development was included in the previous Local Plan, but no consideration was given to the future need for expansion or integrating the site with the wider community of Blakeney. The current plan review is an opportunity to take a long term strategic approach to development within the village and to integrate future proposals more fully with the existing settlement. Development within BLA01 & BLA09 would be a natural extension to the recent Avocet View development and would allow for future natural expansion, if developments are design to facilitate this. Axis has been in contact with the landowner and their agent and they have confirmed that the land is still available for development within the plan period and that they will be making representations accordingly. Potential development of BLA01 & BLA09 could be delivered over a number of phases, as required by the needs of future plan reviews. In addition, there is sufficient land available to accommodate Public Open Space (to enhance the overall provision in Blakeney) and to provide a suitable buffer to the SSSI, that could be used for habitat creation/enhancement. Furthermore, there is scope to provide footpath and cycle way links to Langham Road, Morston Road and Oddfellows Field to help integrate the future development with the existing settlement.</p>

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DS24	BLA04/A	Faulkner, Mr Anthony (1218558)	LP215	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. There is no need for more market housing in Blakeney which will not contribute to the national need for permanent housing as it is likely to become second or holiday homes. What is needed is more affordable housing, preferable rented, which is best provided on exceptions policy land where its use is protected for all time. To omit the proposal for BLA04/A and look instead for a site, or sites, suitable for a small development of perhaps 6 to 10 houses on exception policy land. A suitable site may be as an extension of Oddfellows on part of BLA01, or BLA05 for its proximity to the school.
DS24	BLA04/A	Foreman, Mr David. Foreman, Mrs V. Flude Mrs & Mr, (1209776, 1215854, 1218471)	LP010, LP777, LP781, LP231	Object Object Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. 1. New development should not take place on green field sites, with global warming and uncurbed population increases, agricultural land will be needed in the future for food production and the building of new homes will put a further strain on water supplies. 2. In your recent Glaven Valley Conservation review document it referred to "the important views of the Conservation Area across the field (BLA04+A) to the east of Langham Road" and showed a photograph thereof. The development of this area would destroy this important view. 3. The field (BLA04/A) to the east of Langham Road is a wildlife corridor for many birds and animals and a hunting ground for protected species such as Marsh Harrier, Red Kite, Buzzard, Sparrow hawk, Kestrel, Barn Owl and Tawny Owl, the Owls both breed in the immediate vicinity. 4. Further development should be within the existing built-up area of the village, particularly where sites are being redeveloped, over 50 new homes have been created this way over the last 20 years, without using green field sites. 5. If the only site for future housing has to be a green field site adjacent to Langham Road, then a continuation of the development on the western side of Langham Road (BLA09) would be less obtrusive and have less landscape impact when entering the Village than that on the eastern side. It would also have less impact, with it affecting a much smaller number of existing properties, as compared to development to the east of Langham Road (BLA04/A) which would affect many more properties. The proposed development land is at a much higher level than some of the existing bungalows in Kingsway and therefore would seriously impinge on them. 6. Should any future development take place the cost of the enhancement that would be required to the footpaths and sewage network, bearing in mind the recent problems with sewage that have been experienced within the village, should be born entirely by the developer and not by District Council/Parish Council/Residents. 7. The land east of Langham Road (BLA04/A) is just as much in the countryside as alternative sites in Saxlingham Road, Morston Road and west of Langham Road, that you quote as having an adverse impact on the Area of Outstanding Natural Beauty. 8. The site BLA04 is considerably higher than Kingsway. Any development of this land would have an overbearing impact on the adjoining properties. All of these properties are bungalows, they were built with their living accommodation to the rear to take advantage of the open countryside views and the natural light from the south. As a result of the orientation of our homes, during the winter months, we enjoy a degree of passive heat from the low winter sun. This is a valuable amenity, reducing our fuel bills and hence our carbon footprint. The loss of light and privacy would be unacceptable. There would also be the introduction of light and noise pollution associated with a large residential development. This would be in contravention of ENV10 of the draft local plan which is designed to protect the amenities of existing residential properties. 9. The other major environmental impact would be the loss of the view as you approach Blakeney from Langham.

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					<p>The view to the east across open fields towards the church would disappear. The loss of this view would certainly have a detrimental impact on Blakeney and should be preserved at all costs.</p> <p>The alternative sites BLA01 & BLA09 being proposed by the residents of Kingsway provide a much better overall long-term solution. They are large enough to accommodate the number of houses required for this phase and future phases. The development would have less visual impact when approaching from Langham as the land falls away to the north. There is also an large mature hedgerow which helps screen the site from the Langham Road. There is also the possibility of a road through to the Morston Road, which even if it has to be access only, it would elevate some of the additional traffic congestion on the Langham Road. The possibility of a pedestrian access via Haywoods Close would integrate the new development into the existing landscape. It would allow safe access to the daycare facilities at Thistleton Court and the doctors surgery for the elderly. Children attending the village school could walk safely through Queens Close and across the playing fields to school, without having to walk down the busy Langham Road. As Blakeney has been designated as a growth village the land BLA01/BLA09 would appear to provide a long-term solution to Blakeney's housing needs without causing any unnecessary environmental impact. As Blakeney is now classed as a Large Growth Village, is it not better to think about possible future needs for development, rather than just serving the immediate short term needs of the village. As the land at BLA01 and BLA09 is now available, the proposal put forward by Mr Clive Albany, serves the immediate needs of the village while allowing for future requirements with continuity of development.</p> <p>10. With the huge number of new homes being built in Holt, this should provide sufficient homes for the surrounding area including the Glaven Valley villages, for at least the next 20 years, particularly as there is very little employment in the area.</p>
DS24	BLA04/A	Cooper, Mrs Alison (1216386)	LP189	Object	<p>Abandonment of proposals to designate area BLA04/A on the edge of Blakeney for building.</p> <p>~I agree with all the points made by Mr. D Forman (1209776) and what follows adds to his comments.</p> <p>~The plan itself already lists several objections to the choice of this site for building (visual intrusion, good agricultural land, AONB etc.). The argument seems to be that it is the least bad option</p> <p>~BLA01 which already has buildings on three sides is more appropriate as it is virtually infill.</p> <p>~the Plan's arguments appears to be that there is a footpath from BLA04/A towards the school. However the new build housing would not remove the existing difficult part of this route (a narrow path between woods and high fences)</p> <p>~Not only is BL04/A an important natural habitat but walkers from or to the Langham Road will lose a pleasant footpath along the side of a field edged with trees full of wild life</p> <p>~BL04/A occupies rising ground, The nearest properties (on Kingsway) are bungalows so that visual impact on the existing landscape is minimized to preserve the view along Langham Road towards the marshes and the sea. But I presume that any new builds will be at least 2 floors high and therefore overlook the bungalows and have a serious visual impact on the whole area.</p>
DS24	BLA04/A	Cox, Mr & Ms Peter & Valerie (1218466)	LP766	General Comments	<p>~the village struggles with school and doctors are overstretched now, it is very difficult to get appointment also where will people work?</p> <p>~How will we support more houses?</p> <p>~The first plan will need to have a road coming out of estate onto Langham road, this is a small busy road unsuitable for more cars coming onto it, if however the estate has to be thereabouts the other side of road (BLA09) already has</p>

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					<p>an access road, so why yet another access road?</p> <p>The outstanding view coming into village via Langham Road is something that the many visitors see first.</p> <p>~The area suggested off Morston Road (BLA01) or BLA08 would be safer as Larger Road (A road) this will also not be so destructive re views as you come into Blakeney. The outstanding view coming into village via Langham Road is something that the many visitors see first.</p>
DS24	BLA04/A	Cox, Mr Peter (1215783)	LP122	Object	<p>~when we wanted to remove some trees from the back of our garden we were told we could not as it would spoil the view coming into Blakeney down the hill</p> <p>~we were told at the time that the field behind us (plan BLA04/A) would never be altered due to the AONB of the area and Blakeney conservation Plan 2018</p> <p>~However the Oddfellows land going onto The Morston Road must be the most suitable of all due to Road Access.</p>
DS24	BLA04/A	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP660	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development in AONB undermines both national planning policy and emerging local policy in Policy ENV 1. Paragraph 172 of the NPPF states that, (in Areas of Outstanding Natural Beauty): ‘Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.’ The Plan’s Policy ENV 1 reflects the national policy position. Thirty new homes must surely constitute major development in the AONB. However, Policy DS 24 does not set out any exceptional circumstances as to why this site should be developed, nor is any attempt made to demonstrate that development of this site would be in the public interest. This site should be removed. New homes could be met through the provision of a number of smaller sites, none of which would constitute major development. Proposed site could contribute five of the units required, in a highly sustainable location with minimal impact on the AONB due to the high quality of the proposed homes, which would be designed to respect and enhance the landscape and environmental setting.</p>
DS24	BLA04/A	Bryant, Mr John (1216275)	LP183	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: A change of the preferred site from BLA04/A to BLA01. Next to the public footpath (Langham rd to the Saxlingham rd and church) are 4 magnificent scots pine trees. There used to be 5. Was told by NNDC that these trees formed a very important feature. Views across the field to more open farmland, church and these trees. They could not be removed under any circumstances I was told. Neighbour had similar conversation with NNDC. Yet the preference for bla04/a states that this site has a less sensitive landscape than other sites in the village. This appears contradictory to what myself and my neighbour were told. Whilst the site would be landscaped, the views which NNDC told were sacrosanct would now be sacrificed to the building of houses.</p> <p>Accept that Blakeney provides more houses. Why is this site preferred when there are seemingly obvious alternatives. Accept that Blakeney provides more houses. Why is this site preferred when there are seemingly obvious alternatives. If Avocet view was felt desirable then it is on that side of the Langham road that development should continue rather than break into greenfield site such as bla04/a. bla01 and bla09 are 1. A continuation of an existing development as opposed to a totally new development on a greenfield site 2. Development of those sites would not only meet the building requirements in the short term, but give potential for further future housing should it ever be required. 3. The sites are more enclosed from a landscape perspective and the views beyond them are to other houses. 4. It would leave the site bla04/a and its neighbouring fields as it is on entering Blakeney with its views of the church, scots pines, etc. This would be more desirable and in accord with my</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					understanding of what I was told when the question of the trees was raised as above. I would respectfully ask you therefore to reconsider your existing preferred site in favour of the site(s) mentioned above.
DS24	BLA04/A	Bryant, Mrs Lynda (1216266)	LP181	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: A change of the preferred site from BLA04/A to BLA01. Amazed that bla04/a was the preferred option! Common sense says to me that surely extra houses should be built where extra houses have already been built. Why would you propose a green field site in preference to a site(s) that is already adjoining the existing new development? Become used to the new houses to the left, bla01 would be beyond this and therefore not visible from the Langham road. BLA04/a would ruin the view to the right of the road with its views across open farmland to the church and bordered by scots pines. Avocet view is a very attractive development, it has moved the village boundary in a southerly direction. Expected further development to be in that vicinity; bla01 and bla09 , I.E. Extending an existing development. Bla09 could be used in future if more development required. If these sites were preferred options; the expansion of the village would already have been facilitated.
DS24	BLA04/A	Hill, Mrs Janet (1216125)	LP165	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: A reduction in housing numbers and a limitation to types that will provide affordable housing only for the village to supply local housing need and therefore be sustainable. Adverse impact on the entrance to the village as seen from Langham Road and on the North Norfolk Coast European Marine Site, Special Area of Conservation and Special Protection area from additional residents using and accessing the coast which is not offset by provision of alternative sustainable features such as open space. IF the development were to proceed it would need appropriate and adequate screening on the southern and eastern sides which will require substantial 30m wide (minimum) tree belts to screen the development and the retention of the western boundary field hedge to retain this characteristic rural lane If development were to proceed it should not have street or other outside lighting Similarly if the development were to proceed it should be low level housing (not beyond 1.5 story height) to minimise impacts
DS24	BLA04/A	Kewell, Mrs Helen Roden, Mrs Sarah, Albany, Mr Clive (Agent) (1216776 1216777 (1216772))	LP233 LP232	Object Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The removal of BLA04/A as the Preferred Site and the promotion of BLA01. Objecting to BLA04/A for the following reasons a) Preference for BLA04/A is based upon NNDC assessment that the site has a less sensitive landscape setting than other sites in the village. This is contradictory as the Local Plan states that “BLA04 mirrors the recent Avocet View development and has a less sensitive landscape setting than other sites in the village”. b) In the draft Blakeney Conservation Appraisal Report of August 2018 under Section 8.3.5, it states that “Views of Blakeney from Wiveton and Cley and from the surrounding landscape to the south and south west will be preserved” .Page 134 shows such views from the Langham Road when approaching Blakeney from the south i.e. just where BLA04/A is planned to be built upon. In addition, on P88 the report states “New developments will not negatively impact on views within or towards the Conservation Area” i.e. across the field of BLA04/A. Thus construction of 30 houses on BLA04/A will affect such views and make a mockery of this important Conservation Report. c) A line of Scots pine and other mature trees have softened the urban edge of Blakeney over the 50 years since the Kingsway houses were built. At least two properties backing onto FP6 have been denied permission by NNDC to reduce or remove such trees (although they are not subject to a tree preservation order) with the reason given that such action will affect the importance that they give to the visual impact when entering the village from the south along the Langham Road. Housing development on BLA04/A will completely hide this view. d) Housing development should be restricted to building off the existing Avocet View (Harbour Way) estate by providing a two-way access road along the southern side of Avocet View development into

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					BLA01 which sits better into the landscape. The Local Plan accepts that access is practically possible. BLA01 and BLA09 land owners have confirmed to NNDC that the land is immediately available as building land. e) Should BLA04/04 be approved, then there is a high probability that the rest if the field BLA04 will be built upon at some future date. The then enlarged housing estate will have a massive environmental and conservation impact on Blakeney which is supposed to be in a conservation area and AONB.
DS24	BLA04/A	Myers, Mr John (1217478)	LP636	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: BLA01 and BLA09, would not enhance the overall layout of Blakeney Village and would offer more difficult access to local amenities and roads. Continuing with existing boundary line of Avocet View across the Langham road, would appear to be the most sensible solution. There is already a higher concentration of houses on the western side of the Langham Road. Affordable housing in Blakeney would be well suited to the BLA04/A site, as this already offers access, via the existing footpath to the primary school, the Pastures, recreation ground, village hall and shop amenities as well as medical facilities. A smooth line of demarcation with the existing Avocet View development with the planned boundary of BLA04/A across the Langham Road would balance the size of the village. This line would be confined within the 30mph speed limits. The Langham Road short stretch access that has to be provided does not represent much of a difficulty, as compared to any road access on the Morston Road.
DS24	BLA04/A	Watson-Farrar, Mrs Penelope (1217361)	LP343	Object	New development should not take place on green field sites as has happened with the site on the other side of the Langham Road, a ludicrously expensive and inappropriate development for an important village, one that has not been popular with either its residents or others in the village, and which has not 'softened in character' despite expensive landscaping. The approach to Blakeney along the Langham Road will be despoiled forever if yet another ill-conceived housing estate of 30 homes is allowed to be built on agricultural land crucially important to maintain Blakeney's unique character. I quote from 20.2 of your document: "The areas that are undeveloped provide important green spaces and recreational areas that are an essential part of the character of the village and are proposed to be retained." Agricultural land is an essential part of that essential character of our village. Blakeney needs space to breathe. Blakeney needs distant views. Blakeney needs to be protected from the NNDC plan in its entirety. Before Blakeney loses its entire unique character, and all the reasons why it has been preserved and marked out as a very special place both in the last century as well as this one, there must be surely be a body of sensible, strong and courageous people on planning committees who are prepared to commit to preserving Blakeney's unique future place in the United Kingdom and who will say, "Enough is enough. "Blakeney is distinctive, individual, and very, very special. It must now be exempt from further suburbanisation and saved from total ruin. There are just some extremely special places in North Norfolk that need saving from being overdeveloped. I do not object to the social housing part of the Plan, and in fact support it wholeheartedly but we do not need any more million pound houses in Blakeney.
DS24	BLA04/A	Sadler, Mrs Katherine (1216707)	LP245	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objections to use of site BLA04/A . (1)It is uphill of the present dwellings, on a protected approach to the village. -- a. The draft Blakeney Conservation Area Appraisal (Aug 2018) states in section 8.3.5 "Views of Blakeney [...] from the surrounding landscape to the south and south west will be preserved". This clearly encompasses the approach from Langham in the south (but not from Morston in the West). It also pledges "New developments will not negatively impact on views within or towards the Conservation Area." Building uphill from Kingsway will do just this. It will interrupt the attractive approach to the village and impede the view of its famous church. -- b. The mature trees separating Kingsway from the field provide a

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>pleasant screen. Building a housing estate in front would replace this with houses, fencing and immature trees at best. Not the rural approach the village presently enjoys. Kingsway resident Peter Cox (1215783): “when we wanted to remove some trees from the back of our garden we were told we could not as it would spoil the view coming into Blakeney down the hill, we were told at the time that the field behind us [...] would never be altered due to the AONB of the area and Blakeney conservation Plan 2018”. -- c. Any new housing built on BLA04/A will overlook the bungalows on Kingsway due to their elevated position, creating overbearing impact and visual dominance. -- d. Point 20.11 of the plan notes that Anglian water has identified issues with sewerage and water supply. Such issues would surely be magnified if the building were to be uphill of Kingsway, and may also impact the buildings downhill, ie in Kingsway and the village hall. . (2). The footpath at the back of Kingsway, FP6, is a pleasant countryside walk through fields and woodland, with low environmental impact as the pathway is not paved or tarmac. Wildlife such as pheasants can often be seen from the path. -- a. The rural nature of the footpath will be ruined by a housing estate. - - b. If the path were to be upgraded (widened with paving or tarmac) to either an access road or to provide pedestrian access to Saxlingham Road, the woodland and all the houses on Kingsway and The Butts would be adversely affected. -- c. Moreover, The Butts appears to be an unadopted lane. This could throw a question mark over its maintenance, which would be a concern with increased use of the path. . (3). The field above Kingsway, site BLA04/A, is a good sized, quality arable field. The field is used for growing food. We should keep using it for growing food. -- a. The aerial view shows it is also an excellent shape, largely rectangular. Nibbling away at it by building a wedge shaped housing estate will make the field a strange shape which will introduce corners and thus impact its usability by agricultural machinery. -- b. It is also home and hunting ground to many animals and birds, including protected species such as marsh harriers and owls which breed nearby. Their habitat and feeding ground should not be eroded. . (4). New houses will require street lights and more light pollution encroaching into the countryside.</p> <p>Instead of BLA04/A, I would support the use of site BLA01, with access from the Langham Road. Here are my reasons. . (1). Site BLA01 nestles lower down the hill and building on it would have less visual impact on the approach to the village, as it would be obscured by the present housing, hedging along Langham Road and vegetation alongside the neighbouring downland. . (2). The shape and location of the field BLA01 within the present boundary of the village makes it more like “in-fill” which is surely preferable to encroaching on the open countryside. . (3). The site backs on to the Queens Close development and could provide a handy pedestrian cut through (eg via Haywards Close) to the daycare facilities and doctors surgery in Queens Close and from there to the rest of the village, minimising the need to walk down the upper part of busy Langham Road with its narrow pavement. . (4). I have heard that the land owner of BLA01/BLA09 is the same as owned the land for Avocet View development and is willing to sell more for a mixed social housing development. . (5). If access to BLA01 from Morston Road is problematic, an Avocet View boundary road could be opened off Langham Road. The existing mature hedges screening Langham Road need not be impacted as the road could be located where the hedge was already removed to build Avocet View. The strip of land required for this road is on the edge of BLA09 which I have heard is owned by the same owners as BLA01. . (6). There would be room for future development should it be needed, whereas building more houses on BLA04 would further detriment the agricultural use of the land and the visual impact on the approach to the village.</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS24	BLA04/A	Terry Stanford, Mr Terry (1217362)	LP344	Object	1: The proposed site would be the first view of Blakeney anyone arriving via the B1156 would see. The field above Kingsway, site 1: The proposed site would be the first view of Blakeney anyone arriving via the B1156 would see. The field above Kingsway, site BLA04/A, is uphill of the present dwellings, and is on a protected approach to the village This view of the still pretty village would be forever lost. 2: This site (BLA04/A) is just as much in the countryside as alternative sites in Saxlingham Road, Morston Road and west of Langham Road, that you quote as having an adverse impact on the Area of Outstanding Natural Beauty. 3: How many of the proposed housing will again go to second homes? A recurring theme in Blakeney. 4: There is little work in Blakeney and presumably any full time residents of a new development will need to work outside the village. Potentially putting 60 extra cars (2 per family) onto already congested rural roads. 3: How many of the proposed housing will again go to second homes? A recurring theme in Blakeney. The alternative sites give better and safer access to the local school, surgery and shops. 6: The field to the west of Langham Road (BLA09) could join with the existing development of Avocet View and have vehicular access to Queens Close where the start of an access road already exists This would channel traffic onto Langham Road at a much safer point. , is uphill of the present dwellings, and is on a protected approach to the village This view of the still pretty village would be forever lost. 2: This site (BLA04/A) is just as much in the countryside as alternative sites in Saxlingham Road, Morston Road and west of Langham Road, that you quote as having an adverse impact on the Area of Outstanding Natural Beauty.
DS24	BLA04/A	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP658	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site is deliverable and available. It could make a small but important contribution to housing delivery, on a site which could accommodate up to five dwellings within walking distance of the village centre, and as such should be considered further for allocation in the draft Local Plan. My client’s site lies within the AONB. The development will be designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape. The scale and character of the properties will reflect their setting, and the associate landscaping will ensure that they integrate into the environment. Consider the HELAA assessment of transport is inaccurate and future highways work would demonstrate that any such constraints can be mitigated.
DS24	BLA04/A	Hadley, Mr Anthony (1217477)	LP637	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: BLA01 & BLA09 road access via Morston Road (BLA01) will be a major safety issue and geographically is further away from local amenities in Blakeney village. There is also a higher concentration of existing houses on the western side of the Langham Road so any future housing development will only add to this situation. BLA04/A will provide safe and easy access not only to the local School but also to the Recreation Ground, Village Hall and local shop with no crossing

Individuals	Number Received	Summary of Responses (Site Policy DS24)
Summary of Objections	18	Objections to development on basis of the environmental impact; no development on greenfield sites as agricultural land will be needed in the future due to global warming and population increase. Other concerns; impact on the approach into Blakeney, views of the church and Conservation Area, which is in conflict with the Conservation Area appraisal that states that these views of Blakeney will be preserved. Lying on higher ground development would be visible, prominent and have a detrimental impact on the distinctive character of the area. Not considered to be enclosed in the landscape. And impact on the amenity of existing properties views and be overbearing. Impact on wildlife including protected species, and on European Marine Site, SAC, SPA from additional residents using the coast that will not be offset by provision of open

		<p>space. Constitute major development in the AONB, undermining national policy and doesn't set out exceptional circumstances or demonstrate this would be in the public interest. Would have the same impact as other sites within the AONB that are considered as having an adverse impact on the AONB in site assessment. Development would cause light and noise pollution impacting on the Dark Skies. Impact on the existing natural footpath adjacent to the site and the existing trees, sections of the footpath would need improving. Nearby residents told they cannot remove their boundary trees as they provide an important feature which is contradictory to this policy which states that this site is less sensitive landscape than others. Concerns that development would extra pressure on the roads, water supply, and sewage capacity. Suggests that further development should be located within existing built up areas or provided on a number of smaller sites which would have less impact. If developed then ensure that adequate screening is provided, no street or outside lighting and houses are lower than 1.5 storey in height. Market housing will merely increase second home ownership, any development should be 100% affordable.</p> <p>A number are proposing alternative sites and consider BLA01 and BLA09 as more suitable sites than the preferred site, perceived that the alternatives would have less impact on the landscape, less detrimental visual impact and less impact on existing residents. A number objecting neighbour onto the preferred site. Consider that BLA01 would provide better/safer access to facilities. Questions whether the most suitable site has been chosen, whether this is demonstrated in the SA and if the statutory consultees including Natural England and Historic England agree.</p> <p>An alternative new site has been proposed, the landowner confirms that the site is deliverable and available and could make important contribution to housing delivery. The proposal would be designed to minimise the visual impact and enhance the setting of landscape. Housing design will reflect their setting and landscaping will integrate site into environment.</p>
Summary of Support	2	<p>Would be well suited to affordable housing, the site offers access, via the existing footpath to the primary school, the Pastures, recreation ground, village hall and shop amenities as well as medical facilities. A smooth line of demarcation with the existing Avocet View development with the planned boundary of BLA04/A across the Langham Road would balance the size of the village and would be confined within the 30mph speed limit. Access onto Langham Road doesn't cause much difficulty compared to Morston Road.</p> <p>One supports DS24 rather than the alternative sites BLA01 and BLA09, considers them to be unsuitable due to road access and being located further from facilities in Blakeney village.</p>
Summary of General Comments	1	<p>One general comment received. Concerns over school and doctor's capacity and employment opportunities. Langham road unsuitable for more cars. Development would impact on views coming into the village and Outstanding view coming into village via Langham Road.</p>
Overall Summary		<p>A number of concerns raised, with many comments raising generalised objections around the potential impact on the environment and the AONB. Concerns that development would be prominent, have detrimental impact on views and on the approach into Blakeney and the character of the town and Conservation Areas. In conflict with Conservation Area appraisal. Damage dark skies from light and noise pollution and impact on wildlife. Potential adverse impact on designated sites from new residents, unable to be mitigated by open space. Constitute major development in the AONB, undermining national policy. Considered to have similar impact on the AONB as other non-preferred sites.</p> <p>Other concerns; pressure on the schools, doctors, roads, water supply, and sewage capacity. Limited employment opportunities. Concerns over the impact on the adjacent footpath and loss of greenspace / agricultural land which will be needed in the future. Concerns with the site access, consider Langham Road to be unsuitable for more cars. Suggest that development should be within the existing built up area or on a number of smaller sites. If developed adequate screening should be provided, no street or outside lighting, houses should be lower than 1.5 storey in height. Should be for affordable homes for local people, not available for second homes. Comment of support states that the site offers access to primary school and other services within village.</p>
Council's Response		<p>Noted: Consider comments in the development of the policy. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment and in relation</p>

to the overall housing requirements identified in policy HOU1. Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape, views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. The location of development has been informed by proximity to the designated sites and the limitations on the wider views over the marshes, the high quality of the landscape around the town and the potential impact on the AONB. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement for the careful attention to site layout, building heights and materials in order to minimise the visual impact of development. Prior approval of a scheme of mitigation to minimise potential impacts on the Wiveton Downs SSSI and the North Norfolk Coast SPA/SAC/Ramsar. The allocation seeks the provision of landscaping along the Northern boundary including the improvement and integration of the existing footpath into a green corridor. National policy dictates that whether a proposal is major development in the AONB is a matter for the decision maker, taking into account its nature, scale and setting. The draft Plan has been subject to an Interim Habitat Regulation Assessment (HRA) with the purpose to assess the potential impacts on Natura 2000 or European Sites and if necessary specify any mitigation measures. The results can be found within the published HRA. A further Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (RAMS) is currently being commissioned collectively by the Norfolk Authorities and Natural England and will help inform the final position towards recreational impacts on sensitive European sites. The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and continue to work with site promoters to take into account biodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact. Development proposals would need to comply with a number of policies (including those relating to affordable housing, open space, providing supporting infrastructure and design) elsewhere in the plan. Dark skies and Light and Noise Pollution will be considered in line with Policy SD13 Pollution & Hazard Prevention & Minimisation, comments will be considered in the finalisation of this policy. The Council has fully engaged with key service providers to identify the likely impacts of development for local highways, water, and sewerage, healthcare and education. The Parish council is also developing its own neighbourhood plan which offers the community the opportunity to add a layer of local distinction to development in order to address evidenced local needs and ensure any development respects community aspirations on local character.

Proposals for Briston

DS25: Land East of Astley Primary School

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS25	BRI01	Daniels, Mr (1217050)	LP270	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The proposed allocations will effectively lead to the coalescence of Briston and Melton Constable and there are concerns that the lack of defensible boundaries will result in development being difficult to control. The commentary of the plan pre-supposes that further development will result in this coalescence being reinforced. The provision of two accesses in close proximity to the school is likely to increase conflict with the operation of the school, particularly with drivers heading east. The allocated sites are also subject to a number of constraints and an assessment needs to be undertaken to ensure that they will actually be able to deliver the requisite level of affordable housing and associated community benefits and that these benefits will not be eroded by viability arguments. A proper assessment needs to be undertaken of all the sites submitted in Briston and with the detailed evidence being provided as to why alternative sites have been rejected. The rejection of sites appears to have been predicated on the basis that the two sites proposed for allocation will meet the needs of Briston and therefore no other sites should be considered. This appears to demonstrate a bias and pre-judgement of other sites. As stated in representations in relation to paragraph 11.10 there are also questions as to the deliverability of a site which has been allocated in excess of 8 years.
DS25	BRI01	Waddingham, R.N. and Family Agent - Hill Iain (Bidwells) (1218558)	LP608	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site is considered to be entirely deliverable, and the owners supports Council’s proposals to allocate the site under Policy DS 25 for residential development The following Representation demonstrates the site’s suitability, achievability, viability, and availability for allocation. The site is located within Briston. The following commentary demonstrates the site’s suitability and that it can, subject to minor alterations, be delivered in accordance with the proposed policy requirements of Policy DS 25. -Landscaping and Site Setting Within Point 1 of the proposed wording of Policy DS 25 -Point 2 of the proposed wording of Policy DS 25 requires the provision of a car parking area for the adjacent school (for pick up and drop off). However, given that both Policy DS 25 and DS 26 have the requirement for a car parking area for the adjacent Astley School, the provision of car parking for the school on both sites may significantly exceed demand. Therefore, Point 2 should be amended to require the provision of a car park, subject to it being demonstrated that there is an unmet need. Accordingly, Point 2 should be amended to reflect: ‘2. provision of a car parking area for the school (pick up and drop off), subject to an identified need’ -Pedestrian and Cycle Access. The site is bound to the north by a joint pedestrian footpath and cycleway, and to the east by a pedestrian footpath. Point 3 of the proposed wording of Policy DS 25 requires the provision of pedestrian and cycle access through the site. Both pedestrian and cycle access through the site can be incorporated into the design of development on the site. -Retention and Enhancement of Mature Hedge and Pond Point 3 of the proposed wording of Policy DS 25 seeks the retention and enhancement of the mature hedge and pond. The requirements of the policy are, where practical and feasible, supported. In addition, it is suggested that the supporting text to the policy states that the feasibility of using the pond for educational purposes linked to the school should be explored. -Water Main As outlined within Point 5 of the proposed wording of Policy DS 25, a water main crosses the site and enhancements to the foul sewerage network capacity will be required. It is noted that a water main crosses the site;

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>this could either be diverted as part of the development or the development could be designed in a manner to not impact upon the existing water main. The wording of Point 5 should be amended to reflect that the foul sewerage network capacity upgrade requirements can be provided as part of development on the site, subject to confirmation of requirement from the relevant statutory provider. And to state that 'a water main crosses the site and enhancement to the foul sewerage network capacity will be required, where an appropriate need is demonstrated'</p> <p>-a range of interest has been received from a variety of developers. Further details on market interest can be provided on a strictly private and confidential basis. Accordingly, this demonstrates that there is market demand and interest in the site; thus, suggesting that there is a realistic prospect that the site will be delivered within the first five years of the plan period, in accordance with the NPPF.</p> <p>-it is envisaged that the development would provide 30 dwellings per annum, ensuring completion in 2022;</p> <p>-Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable. Viable Development of the site for residential purposes is considered viable, taking into consideration the various requirements identified in Policy DS 25 . Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary.</p>
DS25	BRI01	Irwin, Mrs Joan (1209713)	LP006	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have a portion of land (approx. 5 acres) to the north side of Fakenham Road, which is accessible from the main road which could be considered for residential development in the future.

Individuals	Number Received	Summary of Responses (Site Policy DS25)
Summary of Objections	1	One objection received. Concern that development will lead to coalescence of Briston and Melton Constable, and future development will be difficult to control. Concern with proximity of access to the school. Assessment needed to ensure site can deliver required level of affordable housing and associated community benefits. Concerns over the assessments of alternative sites, seems that sites have been rejected on the basis that the two sites proposed meet the needs of Briston, seems to be bias and pre-judgement. Questions the deliverability of a site which has been allocated in excess of eight years.
Summary of Support	1	Support received from the landowner who confirms that the site is available, suitable and achievable. Envisaged that development could provide 30 dwellings per annum, ensuring completion in 2022. Suggest amendment to requirement 2 'provision of a car parking area for the school (pick up and drop off), subject to an identified need'. And to requirement 5 to reflect that the foul sewerage network capacity upgrade requirements can be provided as part of development on the site, subject to confirmation of requirement from the relevant statutory provider.
Summary of General Comments	1	One comment is proposing a new site for development.
Overall Summary		Limited response received. No substantive issues raised . Concern that development will lead to coalescence of Briston and Melton Constable, and future development will be difficult to control. Concern with proximity of the potential site access to the school. Assessment needed to ensure site can deliver required level of affordable housing and associated community benefits. Concerns that the site assessments are bias and

		pre-judged. Questions the deliverability of BRI02 that has been allocated in excess of 8 years. Support received from the landowner who confirms that the site is available, suitable and achievable.
Council's Response		Noted. Consider comments in the finalisation of the policy. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety and access arrangements. The Council have undertaken a proportionate assessment of plan viability which takes into account relevant policies, local and national standards and feedback from local developers and site promoters. The approach is intended to provide added certainty around viability and delivery, by setting clear affordable housing requirements. The Authority wishes to ensure, as far as it is able to do so, that the required growth, and in particular the affordable homes that are required, are actually provided. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. A detailed site assessment process of each of the options has been completed. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. Full details of the methodology used can be found in Background Paper 6 - Site Selection Methodology and results. Comments noted on deliverability and will be addressed in the next iterations of the plan. Welcome clarification on availability.

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DS26: Land West of Astley Primary School

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS26	BRI02	Daniels, Mr, Mr Jon Jennings, Cheffins Planning (Agent) (1217050 1217047)	LP270	Object	The proposed allocations will effectively lead to the coalescence of Briston and Melton Constable and there are concerns that the lack of defensible boundaries will result in development being difficult to control. The commentary of the plan pre-supposes that further development will result in this coalescence being reinforced. The provision of two accesses in close proximity to the school is likely to increase conflict with the operation of the school, particularly with drivers heading east. The allocated sites are also subject to a number of constraints and an assessment needs to be undertaken to ensure that they will actually be able to deliver the requisite level of affordable housing and associated community benefits and that these benefits will not be eroded by viability arguments. A proper assessment needs to be undertaken of all the sites submitted in Briston and with the detailed evidence being provided as to why alternative sites have been rejected. The rejection of sites appears to have been predicated on the basis that the two sites proposed for allocation will meet the needs of Briston and therefore no other sites should be considered. This appears to demonstrate a bias and pre-judgement of other sites. As stated in representations in relation to paragraph 11.10 there are also questions as to the deliverability of a site which has been allocated in excess of 8 years.
DS26	BRI02	Waddingham, R.N. and Family, Hill, Mr Iain, Bidwells (Agent) (1218558)	LP596	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site is considered to be entirely deliverable, and the owners support the Council’s proposals to allocate the site under Policy DS 26 for residential development. The following Representation demonstrates the site’s suitability, achievability, viability, and availability for allocation. The site is located within Briston. The following commentary demonstrates the site’s suitability and that it can, subject to minor alterations, be delivered in accordance with the proposed policy requirements of Policy DS 26.</p> <ul style="list-style-type: none"> -Landscaping and Site Setting Within Point 1 of the proposed wording of Policy DS 26 -Point 2 of the proposed wording of Policy DS 26 restricts vehicular access to one point from Fakenham Road. One point of access may prejudice the quantum of development which could be achieved to the south (as outlined within Point 4 of Policy DS 26). Accordingly, in order to provide sufficient flexibility, the access strategy should be devised through appropriate supporting technical work, provided by a Highways Consultant, in line with Norfolk County Council Highways advice, which will inform the quantum and location of vehicular access points. <p>Whilst every effort can be made to explore the possibility of achieving access to the site from the west, this land falls outside of the land owned and controlled by R.N. Waddingham and Family. Requested that second part of point 2 is deleted.</p> <p>Point 3 requires the provision of a car parking area for the adjacent school (for pick up and drop off). However, given that both Policy DS 25 and DS 26 have the requirement for a car parking area for the adjacent Astley School, the provision of car parking for the school on both sites may significantly exceed demand. Therefore, Point 3 should be amended to require the provision of a car park, subject to it being demonstrated that there is an unmet need. Accordingly, Point 3 should be amended to reflect: ‘3. provision of a car parking area for the school (pick up and drop off), subject to an identified need’</p> <p>BRI02 was submitted as a larger site through the Call for Sites, the southern element has not been identified as a preferred allocation. It is suitable, available, achievable and viable and deliverable.</p> <p>Support point 4 – development on the site can be designed to ensure that development to south and west could come forward in the future.</p> <ul style="list-style-type: none"> -Pedestrian and Cycle Access and green links can be incorporated.

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>Amend Point 6 to reflect that Foul Sewerage Network Capacity upgrade requirements can be provided as part of the development on the site. Amend to: '6. Enhancement to the foul sewerage network capacity, where demonstrated by an identified need'.</p> <p>-a range of interest has been received from a variety of developers. Further details on market interest can be provided on a strictly private and confidential basis. Accordingly, this demonstrates that there is market demand and interest in the site; thus, suggesting that there is a realistic prospect that the site will be delivered within the first five years of the plan period, in accordance with the NPPF.</p> <p>-it is envisaged that the development would provide 30 dwellings per annum, ensuring completion in 2022;</p> <p>-Based on the suitability assessment above, there are no site-specific constraints which could preclude the delivery of residential development on the site. Therefore, residential development on the site is deemed to be entirely achievable. Viable Development of the site for residential purposes is considered viable, taking into consideration the various requirements identified in Policy DS25. Further evidence on viability can be provided on a strictly private and confidential basis, should this be deemed necessary. Policy DS 26 Land West of Astley Primary School Land amounting to approximately 2 hectares is proposed to be allocated for residential development for approximately 40 dwellings. Development proposals would need to comply with policies including those relating to affordable housing, open space, supporting infrastructure, elsewhere in this plan and the following site specific requirements: 1. consideration of the landscaping and setting on the Fakenham Road; 2. restriction of vehicular access to one point from Fakenham Road, unless it can be demonstrated through supporting technical work that alternatives are feasible; should be restricted to a single access point and alternative access arrangements via the adjacent estate roads should be explored; 3. provision of a car parking area for the school (pick up and drop off), subject to an identified need; 4. development layout that does not prejudice the potential development/redevelopment of land to the south and west; 5. provision of landscaping, pedestrian and cycle access, and green wildlife links through the site; and 6. enhancement to the foul sewerage network capacity will be required, where demonstrated by an identified need.</p>
DS26	BRI02	Irwin, Mrs Joan (1209713)	LP006	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have a portion of land (approx. 5 acres) to the north side of Fakenham Road, which is accessible from the main road which could be considered for residential development in the future.

Individuals	Number Received	Summary of Responses (Site Policy DS26)
Summary of Objections	1	One objection received. Concern that development will lead to coalescence of Briston and Melton Constable, and future development will be difficult to control. Concern with proximity of access to the school. Assessment needed to ensure site can deliver required level of affordable housing and associated community benefits. Concerns over the assessments of alternative sites, seems that sites have been rejected on the basis that the two sites proposed meet the needs of Briston, seems to be bias and pre-judgement. Questions the deliverability of a site which has been allocated in excess of eight years.
Summary of Support	1	Support received from the landowner who confirms that the site is available, suitable and achievable. Envisaged that development could provide 30 dwellings per annum, ensuring completion in 2022. However requirement 2 restricting the site to a single access point may prejudice the quantum of development in the future. The land to the west falls outside of the land owned by R.N Waddingham. Suggest amendment to

		requirement 3 'provision of a car parking area for the school (pick up and drop off), subject to an identified need'. And to requirement 6 to reflect that the foul sewerage network capacity upgrade requirements can be provided as part of development on the site. Suggest wording change; 'Enhancement to the foul sewerage network capacity, where demonstrated by an identified need'.
Summary of General Comments	1	One comment is proposing a new site for development.
Overall Summary		Limited response received. No substantive issues raised. Concern that development will lead to coalescence of Briston and Melton Constable, and future development will be difficult to control. Concern with the potential site access to the school. Assessment needed to ensure site can deliver required level of affordable housing and associated community benefits. Support received from the landowner who confirms that the site is available, suitable and achievable. Concerns that the site assessments are bias and pre-judged. Questions the deliverability of BRI02 that has been allocated in excess of 8 years. Support received from the landowner who confirms that the site is available, suitable and achievable.
Council's Response		Noted. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety and access arrangements. Welcome clarification on availability. The Council have undertaken a proportionate assessment of plan viability which takes into account relevant policies, local and national standards and feedback from local developers and site promoters. The approach is intended to provide added certainty around viability and delivery, by setting clear affordable housing requirements. The Authority wishes to ensure, as far as it is able to do so, that the required growth, and in particular the affordable homes that are required, are actually provided. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. A detailed site assessment process of each of the options has been completed. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. Full details of the methodology used can be found in Background Paper 6 - Site Selection Methodology and results. Comments noted on deliverability and will be addressed in the next iterations of the plan.

Proposals for Ludham

DS27: Land South of School Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS27	LUD01/A	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS27)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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DS28: Land at Eastern End of Grange Road

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS28	LUD06/A	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS28)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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Proposals for Mundesley

DS29: Land off Cromer Road & Church Lane

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS29	MUN03/A	Camus, Mrs Elizabeth (1216244)	LP186	Object	<p>Reduce the number of houses that you are proposing to build but if needed then build in small groups around the village. I have lived in Mundesley for several years, and have seen the village grow with the addition of other large estates,</p> <ul style="list-style-type: none"> -I have also seen the amount of time I have to wait for a doctors appointment considerably increase, surely allowing another fifty houses to be built as one large estate will add a lot more pressure to those waiting lists. -The site of these houses will also add to the ever increasing amount of traffic that uses Cromer Road. -as a non driver that uses the buses, many services are being reduced, and more houses means more pressure on public transport. -What about the local school, or are you assuming that these new houses will as many are in the village, be second homes, therefore not adding to the school numbers. -more second homes do not bring value to the village as they are only used a few times a year and the people I know who have these homes rarely shop in the village. -there will be eight affordable properties from the fifty, I doubt any of the younger locals could afford to buy one even if they got the chance, there is not enough work in this area to support another fifty houses being built and locals being able to purchase them. to reduce the number of houses that you are proposing to build, but if you must build them please use your common sense and build them in smaller groups around the village in more discreet sites which will not offend the people who already live here or the people who visit.
DS29	MUN03/A	Barnes, Ms Jane (1218558)	LP084 LP085	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Wholly unsuitable. On the highest point of the village and is very close to the Church; as with the four already designated it will ruin the landscape from every angle and approach into the village. On this highest point it is possible to see four different churches in the surrounding countryside, this view will be lost, and more importantly the view of the beautiful church and the landmark Trafalgar Court will be blighted by a mass of red roofed houses dominating the skyline. Site runs parallel to the coastal erosion zone, and is also the narrowest and most dangerous section of Cromer Rd, so perhaps this is why this particular site was rejected before on the previous core strategy plan! Turning the adjoining site into a public green space is ridiculous, as we already have a very large green space with a children's play area within a few minutes walk of this field. Building this large amount of houses on one relatively small site will also have a significant effect on the tourism trade and this is very important to our village, we do NOT want to become a sprawling "town" of built up estates which unfortunately has already had a detrimental effect on the landscape as you drive into Mundesley on the Cromer Rd. Mundesley needs fifty more houses, a better plan/ more beneficial for the village is to build on smaller sites spread around the village. Alternative sites; MUN08, MUN 09 and MUN11 could each take smaller number of houses but would not change the landscape and not have the detrimental visual impact that using MUN03 would have. The photo attached shows the visual impact of the house already being built on the MUN03 site, and this house is not even on the highest part of the field, imagine fifty more and how that landscape would then look.</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS29	MUN03/A	Brightman, Mrs Catherine (1215720)	LP117	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Added overload on the doctors and school, the position of the site, and because of the extra volume of traffic on Cromer Road, Cause even more safety problems on Cromer Road. Opposite a blind bend and on a very narrow section of Cromer Road, parallel with the coastal erosion zone, so why pick this site over any of the others? On a very high point in the village and will be seen from every access point into the village, the church will be obliterated from view, and once the site is developed it will stick out like a sore thumb! How are the doctors and schools going to cope with extra people, why do we need a green space, when it is already a green space with alpacas on that everyone loves. Only a few minutes walk from Gold Park where everyone can enjoy a green space, a MUGA, a skate park and a lovely chiders play area. This is not the right site, and any development of fifty houses should be dispersed around the village so that this village does not look like an urbanisation.
DS29	MUN03/A	James, Mrs Rosemary (1215666)	LP114	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I can bare witness to how dangerous Cromer road is, a hidden bend right opposite the site and the speeding aspect is outrageous, this area of Mundesley does not need any further building as it is heavily built up with the Norfolk Homes site. We do not need more pressure put on our service facilities such as the doctors surgery or the schools, have to wait three weeks for a doctors appointment now, certainly if these fifty houses are built as one development rather than being spread over the twenty years as stated in your plan, this will add considerable pressure to an already overwhelmed system. The site is on very high ground and the four roll back houses that are currently being built look totally out of place now. Photo attached from the church entrance towards proposed site, which sits much higher than the Church, become a very big blot on the landscape.
DS29	MUN03/A	James, Mrs Rosemary (1215666)	LP114	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The site needs to be in a visually less overbearing place such as MUN09 or split into several smaller developments which would be much more appealing to the local residents.
DS29	MUN03/A	Louise, Ms Sandra (1215668)	LP115	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I do not think building fifty houses with only eight as "affordable homes" will enhance this village in any way. I live in a street where at least half of the houses are second homes, they visit infrequently and the houses stand empty for most of the year. I suggest that another fifty houses will be much the same, the affordables will not be affordable, and the larger houses will all be sold to the second home brigade as the prices will be too expensive for the average local family. Perhaps if they were all built as affordable/social housing specifically for people that live within the village postcode, things might be different, but I doubt this will be the case! Build more affordable housing for our younger families, don't build them on this site as it is too close to Cromer Road, and preferably don't build them at all!
DS29	MUN03/A	Wheldon, Ms Ginny Wibberley, Mr Chris (1216703 1216702)	LP214 LP301	Object Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In addition the entrance for the proposed site is from Cromer Road on a blind bend which is already dangerous with speeding motorists coming round the corner on the wrong side of the road. To add more traffic to this narrow part of the road will cause accidents, either involving pedestrians or vehicles. Parking outside Tesco's store just up Cromer Road from the site is also extremely dangerous and adding more traffic/more customers will only make this far worse.

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS29	MUN03/A	Revell, Mrs Denise (1210223)	LP034	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It's In the wrong place and does not support the needs of the village. MUN03 borders on the busiest route into the village, Cromer Road also the most developed area of the village and if you follow it through to the other end of the village it is the only place without significant development and this site is prominent on the landscape. Access onto this site via Cromer Road is on a blind bend, the road is narrow and the only existing footpath would have to cross the access road causing a safety hazard for pedestrians. During the holiday season this road, being the only road along the coast is extremely busy, accessing the road from this point is already treacherous. In addition to this there are already problems in the area due to no available footpaths to access Warren Drive via Church Lane so that parents can get their children safely to school. The proposed additional green space in this area is would be surplus to requirements as there is adequate green space and play provision at Gold Park. Proposed green space would be in a dangerous position for open space as it is on a busy bend in the road. It is also the highest point of the village so any new estate built on will be seen from all aspects therefore blocking the view of the Church and other important landmarks for the villagers and visitors. Previous planning permission for this site was refused several years ago so should be again now. Previous building on the Cromer end of the village, formally the RAF camp, is not the most attractive entrance to the village and a further 50 houses of this type at this point on Cromer Road will only make a further blot on the landscape. They could be built in smaller clusters spread around the village and this will not have a negative impact on the village.</p> <p>The area MUN11 At the edge of the village on Cromer Road would make a more suitable site for development.</p> <p>The road is straight allowing visibility for vehicles entering and leaving the site and there is already existing access to the site from Collingwood Drive. The existing services, water, drainage, electricity supply and telephone etc could easily accommodate additional houses. The site is not prominent on the landscape and a housing development on this site would easily blend in. There are no flooding or contamination issues, and the area is supported by public transport. This site does not get used as open space as it was originally proposed to be because there is nothing to attract people to use it and it is at the wrong side of the existing development and with the already open space and play area within two minutes walk this area would make it a prime area for development.</p>
DS29	MUN03/A	Reynolds, Mrs Bev (1210091)	LP044	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: See Rep LP034 plus additional points: Mundesley relies heavily on the revenue provided by visitor, who come for the Blue flag beach, the charm and the fact that it remains relatively unchanged. We do not want to become a concrete urbanised settlement which deters visitors from coming, and who regularly visit the village because of its quintessential seaside charm. I appreciate that we must build new houses, especially affordable ones but: The site will be seen from some miles away. MUN03 was previously turned down in favour of the Water Lane development for just that reason. The infrastructure of the village, i.e. Doctors, the School etc will be seriously under pressure Why would we want to jeopardise this in any way by building a "blot on the landscape' on the busiest main route into Mundesley. Previous allocation is extremely large, and Cromer Rd is very built up, so adding another estate on the coast road is going to make this end of the village an even bigger urban jungle. The section of Cromer Road where the proposed estate is to be built is in the coastal erosion zone, so is this considered insignificant when choosing sites to build new houses? The volume of traffic increases every day, let alone the continued anger of residents over the speeding! This area including, parcel 3, is best left as a natural habitat as it has always been, changing it by building pathways and cycle routes through it will upset the biodiversity of the area, and who would be responsible for the maintenance of this green area? 50 houses should be built in smaller development clusters in various areas spread around the village,</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					<p>specifically in two of your alternatives, MUN11, and MUN09. MUN11 is situated on a wider more accessible length of Cromer Rd, it would not be in prominent sight and would blend in with the other houses in the vicinity, and there is already an access point from Collingwood Drive. It is a 3 acre site, all services would be easily accessible, and it has direct public transport links. It is not used as a public green space area, as within two minutes walk there is already a children's play area and a maintained open green space. This is a prime site for future development. MUN09 is an area that sits just behind a new development of bungalows, so any argument that Highways access is unsuitable, or it is too far from key services is not valid, as an existing new build of 10 bungalows was built only a couple of years ago. It is also very close to the school allowing parents to walk their children to school, and the area is supported by public transport. Surely building these smaller developments would provide opportunities for our local builders giving more employment opportunities for local people.</p>
DS29	MUN03/A	Roberson, Mr Paul (1216428)	LP193	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: MUN03 is not suitable, it would completely spoil That part of Mundesley, the church opposite gives that area a lovely un spoilt feel. It is home to a considerable amount of wildlife. Cromer road has become congested around the Tesco's, there have been accidents there and several near misses, having an entrance onto the proposed site from Cromer Road or Church Road would be an issue, neither of the roads are suitable to have extra traffic entering on to them. it would also be a shame to loose the field that is home to the Alpacas, these have become a tourist attraction, I have been asked on several occasions by holiday makers where they can find them. Concerns as to how the doctors would cope, I am constantly being told of patients having to wait for several weeks to see a doctor, 50 more homes will not help this situation.</p>
DS29	MUN03/A	Kelly, Mr Sean (1216516)	LP198	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: What evidence do you have of any "identified" need for this scale of development in Mundesley? You have arbitrarily allocated this number to Mundesley in order to meet the government target for the number of houses to be built in North Norfolk. You have then, simply to reduce the work load arising from the development of a new Local Plan identified an area of land of sufficient size to deliver the allocation in a single parcel. There is a ready supply of properties of all types for sale in Mundesley particularly at the starter home end of the market which would be attractive to local residents. There is no requirement for anywhere near this number of additional homes in Mundesley and, as evidenced by the recent development on the north side of this site it is highly likely that proposals will be to build as many expensive high end homes as possible. The scale of the development is not appropriate for the site as because of the topography of the and it will completely dominate the surrounding area. Any development of the southern area of plot 1 in particular will be several feet above the level of surrounding properties in Church Road, Church Lane and the north end of Manor Road. Any development in this area will completely obscure the horizon for all properties in that area. Because of the elevated position of the site any large scale development will be visible for miles around. The site is surrounded on three sides by the conservation areas of Mundesley a development on this scale, especially at the southern end of the plot will impact negatively on those conservation areas by completely altering the character of the immediate surrounding area from open farmland to dense urban development. There will be no point in having a conservation area. There are no employment sites nearby so a development on this scale will result in a significant increase in commuter traffic as. This is also true for travel to secondary and tertiary education as well as healthcare facilities and all retail activity except for immediate local store type shopping. Replace the large scale development in the proposed plan with a significantly smaller development on this site and identify other smaller scale sites in the surrounding area. Restrict development on this site to the north west of the site so it</p>

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
					will not dominate the existing homes that surround the current proposal and will be less prominent in the landscape. Any public open space should be formed in the area adjacent to Church Road and Lane to reduce the overbearing nature of the current proposal on the surrounding properties.
DS29	MUN03/A	Bates, Mr & Mrs Clive & Eileen (1215840)	LP124 LP703	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Developments have to be done with respect and fitting in with the local environment. Development of Cromer Road gives me concern. Need to make available affordable homes so young people can live in the village and bring up their families, do we need more expensive properties so a % of them just become second homes as has occurred on another large development in the village. The Impact on the local infrastructure, roads actual accessing the development the junction joining Cromer road will need substantial work to make it safe. The strain on local services; the school is there enough provision to accommodate more children [if these homes are not taken up as second homes] the same applies to the doctors. Local buses have been reduced leading to more local traffic on our roads. Water erosion- rain water percolates through the field reaching the water table, the rain water off the roofs, garages and driveways into soak a ways more quickly finding its way into the water table. [even on the hottest summer days there is evidence of water seeping through the cliffs adding to erosion] would the village centre find itself more exposed to flooding as one of the lowest points in the area? The impact on local wildlife, although the train embankment is proposed to be kept as a through way for wildlife there is also the massive affect to open farmland birds and animals, [they are having a hard time nationally with depletion of habitat and pesticides and global warming] no objection to sympathetic well thought out small developments which enhances the village taking into consideration the villagers wishes and fears especially those villagers who will be affected by the development.

Individuals	Number Received	Summary of Responses (Site Policy DS29)
Summary of Objections	12	The responses primarily focus on concerns over the impact of development on the existing infrastructure and the landscape; located on the highest point of the village, development could be prominent and be detrimental and could result in the loss of views of church and other landmarks. Thereby impacting on tourism. Could also impact on biodiversity on the site, considered best to leave as a natural habitat. Open Space surplus to requirement. Infrastructure is under pressure development could result in more traffic along Cromer Road. Concerns about the safety of the access, located on a dangerous busy bend and the safety of the pedestrian footpaths. No footpath to access school. Further pressure on doctors, schools and public transport. Site adjacent to Coastal Erosion Zone. Need more affordable housing. Market housing will merely increase second home ownership. Not enough work opportunities. Development should be dispersed around the village, more preferential sites within village. A number are proposing alternative sites and consider MUN08, MUN09 and MUN11 as more suitable sites than the preferred site, perceived that the alternatives would have less impact on the landscape and less detrimental visual impact. MUN09 is located behind existing housing, with suitable access and close to key services and school. Suggest that MUN11 would have suitable access and has existing services available. Suggest that building a number of smaller sites would be more appropriate for the village than one large site.
Summary of Support	0	None received

Summary of General Comments	1	One comment received. Concerns of the impact on local infrastructure especially safety of Cromer Road. Will cause a strain on services including schools, doctors. Reduction of local buses causing more traffic. Potential for more flooding from water erosion. Impact on wildlife. No objection to smaller developments which enhance the village. Need more affordable housing, rather than second homes. Development needs to respect and fit in with the local environment.
Overall Summary		The responses primarily focus on concerns over the landscape impact and impact on infrastructure. That development would be prominent, have detrimental impact on views of church and other landmarks and impact on tourism and on wildlife. Open Space considered to be surplus to requirement. Exacerbate existing traffic issues. Concerns with the safety of the access and the pedestrian footpaths. No footpath to access school. Further pressure on doctors, schools and public transport. Site adjacent to Coastal Erosion Zone. Potential for more flooding from water erosion. Need more affordable housing. Market housing will merely increase second home ownership. Not enough work opportunities. Suggest that development be dispersed around the village, more preferential sites within village. Development needs to respect and fit in with the local environment.
Council's Response		Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views have been taken into account when considering all sites. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion, access arrangements and cumulative growth. Mitigation measures will be a requirement to offset any potential adverse impact. Development proposals would need to comply with a number of policies (including those relating to affordable housing, open space, supporting infrastructure) elsewhere in the Plan. The proposed allocation is subject to a specific policy which identifies requirements that development proposals would need to address in order to secure planning permission. This includes a requirement to provide new pedestrian and cycle routes linking to the existing footway on Church Lane/All Saints Way to Links Road. Comments on open space noted. The Council has used current evidence base and engaged with relevant bodies including health and education bodies to identify where additional social infrastructure may be required as a result of new development and it is recognised that there is a requirement for further ongoing dialogue to support any final policy position. The Council has engaged fully with the Environment Agency and other relevant key professional bodies/persons. It has used the most up-to-date flood risk evidence base in order to identify the likely flood risk of sites. Mitigation measures will be a requirement to offset any potential adverse impact (for example the need for Sustainable Urban Drainage Systems). The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and geodiversity and continue to work with site promoters to take into account biodiversity and geodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact.

Proposals for Other Areas

DS30: Tattersett Business Park

Site Policy	Site Ref	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
DS30	E7	N/A	N/A	N/A	None received.

Individuals	Number Received	Summary of Responses (Site Policy DS30)
Summary of Objections	0	None received
Summary of Support	0	None received
Summary of General Comments	0	None received
Overall Summary	No comments received	

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First Draft Local Plan (Part 1)

Regulation 18 Stage Public Consultation

**Appendix B: Schedule of Representations -
Comments Submitted by Parish & Town Councils**

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Appendix B: Comments Submitted by Parish & Town Councils

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Notes

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

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

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

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

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

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

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

First Draft Local Plan (Part 1)

Comments on Proposed Policies

(Submitted by Parish & Town Councils)

Sustainable Development Policies

Policy SD1 - Presumption in Favour of Sustainable Development

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD1	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD1)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy SD2 - Community-Led Development

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD2	Wells Town Council (1212319)	LP098 LP101	Support	The Council notes the principles that any development should support the vitality and viability of the community and that 'no significant harm should be done to the character or setting of the settlement and the surrounding countryside'. (LP Policy SD2 p. 9-10).The Council endorses the encouragement of Community Land Trusts (Homes for Wells) and Neighbourhood Plans. (LP 7.12)	Support for policy approach noted.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD2)
Objection	0	Approach endorsed.
Support	1	
General Comments	0	

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Policy SD3 - Settlement Hierarchy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD3	Cromer Town Council (1218420)	LP732	General Comments	More clarity should be given to footnote 11 which explains the amount and type of "small-scale development" which could be permitted under this policy, so that it should be amended to read "infill development of between 1-20 dwellings (to be selected in a Part 2 Plan)". We're concerned that left as it is that "new allocations" could imply that this type of new development in the named Small Growth Villages could be different from more acceptable "infill development" and could result in estate-type developments of 20 houses	Noted the approach consulted on allowed for infill development and further small scale allocations up to 400 dwellings in total across the identified small growth villages.
SD3	Bacton & Edingthorpe Parish Council (149585)	LP239	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We conclude that Bacton should NOT be designated as a Growth Village in the forthcoming plan. This would allow the local community instead to exercise greater control in future housing growth over the plan period relying instead on the proposed provisions of Policy HOU03 and exception site delivery . Bacton Parish has over recent years accepted housing growth however, it is now time to curtail and control the quantity of housing within the village. Bacton has abysmal public transport links. Additional new houses within the village would lead to great traffic movements. The general level of service provision in the village is not conducive for its further expansion. We have lost two public houses and the retail offering is extremely small-scale. There are no doctors or other medical facility within the Parish. We have struggled in our co-operation with NNDC to find suitable sites for affordable housing so how and where any additional land can be sourced from is unknown to accommodate any future growth. -The village still have no clearly identifiable 'centre', but there remain noticeable breaks in the housing, with fields and farmland never far away, which enable the village to retain something of its "rural" character. The field between the village hall and Mill Lane is a case in point. Further significant amounts of "infill development", as well as new allocations of anything up to 20 dwelling units at a time, to fulfil housing targets, would necessarily lead to a lamentable loss of loss of this remaining rural character, and "quietness", over the plan period. Bacton only has very poor public transport links; the only bus service is sporadic, and does not even begin to compare with the comprehensive and frequent "Coast Hopper". There has been the loss of two public houses since the formation of the previous development plan: "The Ship" and the "Duke of Edinburgh", and retail outlets tend to be confined to small-scale village store, "fish and chip" shop, cafes and services geared towards holiday-makers/visitors. The post office is open a mere half an hour a week. The doctor's surgery is now reduced down to a satellite surgery open briefly by prior appointment, usually only twice a month. This hardly represents a sustainable portfolio of services upon which to base strategically-targeted housing growth.	Noted: Consider comments in the development the policy approach. The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD3	Cley Parish Council (1217592)	LP657	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is little offered in the Local Plan to improve the sustainability of smaller towns eg Holt. The local market town initiative doesn't seem to be having much of an impact. If we lose these towns as retail centres, residents of the surrounding villages will be cut off from services eg banking, and car journeys will increase.	Disagree. Policy ECN4 sets out the approach to retail development.
SD3	High Kelling Parish Council (1210779)	LP147	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: High Kelling is designated as Countryside and most of the village (north of the A148) lies within the North Norfolk Area of Outstanding Natural Beauty. The Parish Council wishes to retain this status. The first draft of the Local Plan identifies 23 villages, including High Kelling, as Small Growth Villages, the majority of which are in the AONB. We are concerned that creeping development in these locations threatens the quality of the landscape which the Local Plan should be conserving. 2. We recognise that some development is necessary to respond to individual and community needs but feel such development should enhance the character of the village and its setting within the countryside and the AONB. We do not wish to see further development in the major part of the village located within the AONB, but believe there is potential for development in those parts of the village outside the AONB. Small scale developments will be permitted in the Small Growth Villages defined in Policy SD3 Settlement Hierarchy footnote 11 as "Infill development and new allocations of between 0-20 dwellings.." North Norfolk is a desirable place to live and we fear that the inclusion of High Kelling as a Small Growth Village will weaken the degree of protection it currently enjoys as Countryside. We feel that footnote 11 opens the way to piecemeal development which, incrementally, will undermine the diversity and essential nature of small villages so that communities with a real sense of local identity blur into adjacent, larger villages and towns or become ghost villages empty in the winter months. There are assurances about village identity - "...the Local Plan proposes modest small scale growth in order to help address housing need, enhance the vitality of the community and support the retention and viability of local services" (Background Paper 2: Distribution of Growth PP118-121). However, when we look at what has happened in our Parish under the existing district and national planning frameworks we are not convinced. Instead we see speculative development, garden grabbing, mansion building and questionable barn conversions. A policy of growth where there are existing services sounds reasonable, but for High Kelling which shares medical and dental provision with Holt, this means additional pressure on services already overstretched with the volume of users	Noted: Consider comments in the development the policy approach. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account. Evidence contained within the Housing and Economic Land Availability Study and NNDC Landscape Character Assessment 2019 and background paper 2 detailing service provision have also been used to inform distribution of growth site assessment and the potential impact on landscape character. Mitigation measures will be a requirement to offset any potential adverse impact.
SD3	Roughton Parish Council (149749)	LP240	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Roughton Parish Council wishes the Parish to be de-selected as a small growth village. The status it unnecessary and put a burden already on our current infrastructure.	Comments noted: Consider comments in the development the policy. Roughton is currently a service village in the adopted

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				<p>We conclude that Roughton should NOT be designated as a Growth Village in the forthcoming plan. This would allow the local community instead to exercise greater control in future housing growth over the plan period relying instead on the proposed provisions of Policy HOU03. The reasons for this is that Roughton Parish has over recent years accepted housing growth however, it is now time to curtail and control the quantity of housing within the village. Roughton has poor public transport links. Additional new houses within the village would lead to great traffic movements. The general level of service provision in the village is not conducive for its further expansion. We have minimal retail offering which is extremely small-scale. There are no doctors or any other medical facility within the Parish. ROU03 has still not been built on due to lack of interest from developers and this was allocated at the previous consultation circa 10 years ago.</p>	<p>Local Plan and proposed to be a small growth village where infill development and small scale allocations across 22 villages up to 400 dwellings would be supported through a plan led approach</p>
<p>SD3</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 296</p>	<p>Southrepps Parish Council (1216226)</p>	<p>LP225</p>	<p>Object</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We note with disappointment the intended Settlement Hierarchy (Policy SD3) approach insofar as it would relate to Southrepps. Whilst welcoming the removal of the current Plan's (Core Strategy 2008) 'Service Village' designation of Southrepps, its inclusion as a 'Small Growth Village' concerns us as – in practise – it would likely result in the same, additional growth the community seeks to limit and on which our previous representation was premised. The Parish Council and the community of Southrepps is not opposed to development; we acknowledge that sustainable growth is the life-blood of a community and necessary/desirable for the development of a village in supporting its facilities and services, and providing housing for its younger families and others. Nevertheless, this must be proportionate and sustainable; we re-affirm our belief that its designation - previously as a Service Village and proposed (in the Draft Local Plan) as a Small Growth Village - has and would undermine this objective, to the detriment of the village and its community. Recent development has been out of scale with the village and its physical/social/environmental infrastructure; our fear is that this would be perpetuated through a Small Growth Village designation. We therefore request that the village NOT be included as a Small Growth Village in the emerging Local Plan. We would have no objection to the village retaining a settlement boundary as such, provide that any related policy in the new Local Plan makes it clear that new any development must be within it and very limited to small-scale – perhaps one or two plots – our preference is for the village to carry a 'Countryside' designation.</p> <p>We note that there is a concurrent 'Call for Sites in Small Growth Villages' consultation; However, we urge the Council to revisit this and not to identify any such sites for development/allocation beyond existing commitments.</p>	<p>Noted: Consider comments in the development the policy approach the distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
Page 297				<p>Please refer to the Parish Council's previous representation of 28th September 2015 and 9th August 2017 summarised below The School is in Antingham and the train station is in Thorpe Market. With a population of 537 the village is simply too small to warrant the Service Village designation. : 1. There is a need to ensure that with development come facilities. Not more development with no additional services for the residents. 2. North Norfolk suffers with over-development and poor infrastructure. This needs to be addressed before more houses are approved. The best infrastructure will always be in the larger settlements/towns which is where most new development should be concentrated. 3. The concept of Service Villages has done little to improve the overall system of development and it is flawed because it means that most villages in north Norfolk receive no development. It is by far the smallest of all the service villages and there are many larger villages which could benefit from some modest development of small numbers of houses spread evenly throughout the county. 4. Smaller villages where there has been no development allowed have suffered with an "aged" population; therefore, not evenly distributing wealth and the volume of new homes. 5. The re-use of rural buildings as dwellings should be welcomed as the eyesores which have been allowed to fall into disrepair will be restored and utilized. This automatically cuts down on the need for larger estates. 6. The introduction of the "CIL" system should be applied to North Norfolk Planning and passed on to the Parishes as a way of mitigating costs incurred by them. We also find that speeding is a bigger problem and that demands on our funds through repairing and replacing village items has been higher. This adds no benefits to the sustainability and cohesive community the residents wish to live in.</p>	
	SD3	Weybourne Parish Council (1216147)	LP168	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Parish Council feel strongly that Weybourne should retain its' designation as Countryside and should not be designated as a Small Growth Village due to the following factors:</p> <ul style="list-style-type: none"> • The lack of a full-time shop in the village and uncertainty regarding the future which is currently up for sale. • Lack of infrastructure, including but not limited to lack of places at local Doctor Surgeries and distance from a major hospital. • The lack of a bus service in the village. Out of season, the bus service in Weybourne is limited. The times of the last buses to/from the village means there is no public transport for children wishing to attend after school clubs or for anyone wishing to travel to or from Weybourne for work. • The limits of the drainage infrastructure in the village. • The quality of the roads in and out of the village, especially to the South & lack of pavements in the village.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				<ul style="list-style-type: none"> • The need for Affordable Housing in the village. • The high proportion of second homes already in the village. • The parish council are also keen to highlight the need for the Second Homes Policy of NNDC to be reviewed. As a village with over 40% of houses either second homes or holiday homes, this has a huge impact on the sustainability of the village. 	as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. The Council is supportive of communities utilising neighbourhood planning powers where there is an opportunity to bring forward additional growth in response to local issues and evidence.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD3)
Objection	5	Issues raised include more clarity around meaning and quantities around infill development. The following PC/TC's objected to being identified as small growth villages: Bacton, High Kelling, Roughton & Southrepps & Weybourne reasons given varied but included preference for exception site development, impacts on existing character & infrastructure and as such small scale allocations run the risk of disproportionate and unsustainable growth. One parish council requested more information on housing need methodology and that more support should be given to small growth towns for the retention and provision of services.
Support	0	
General Comments	2	

Policy SD4 - Development in the Countryside

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD4	Bacton & Edingthorpe Parish Council (149585)	LP239	Support	Allowing unrestrained housing development in unsustainable rural locations would not be the correct way to go about addressing genuine housing need and we support this Policy.	Support welcome.
SD4	Cley Parish Council (1217592)	LP649	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Comes with so many exceptions as to be almost meaningless.	Disagree
SD4	Cromer Town Council (1218420)	LP732	Support	We strongly support this policy as worded in the First Draft Local Plan (Part 1), as it should ensure that only needed housing is built in areas designated as 'countryside'. It is important that affordable homes, as suggested by this draft policy, are included as being possible to develop in 'countryside' as a means of ensuring the continued vitality of smaller rural communities, whilst market housing is not permitted	Support noted: Market housing is permitted as part of an affordable scheme where it is needed to ensure viability in line with national policy.
SD4	Roughton Parish Council (149749)	LP240	Support	The countryside is an intrinsic and defining feature of North Norfolk. Allowing unrestrained housing development in unsustainable rural locations would not be the correct way to go about addressing genuine housing need and we support this Policy	Support welcomed.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD4)
Objection	0	This approach was strongly supported, 1 PC questioned the effectiveness of the policy given the number of exceptions.
Support	4	
General Comments	1	

Policy SD5 - Developer Contributions & Viability

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD5	Sheringham Town Council (1217426)	LP548	General Comments	NNDC does not currently operate a Community Infrastructure Levy. What are the reasons for this? STC would like NNDC to consider introducing a CIL and where funds from the CIL are to be distributed in connection with a project located in Sheringham, then STC should be consulted. STC would request that it is consulted regarding the negotiations of S. 106 planning obligations with developers in connection with developments in Sheringham	The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging policies on the economic viability of the development expected to be delivered through the Local plan. The potential to accommodate a community infrastructure levy charge is considered as part of this. The study is published as part of the evidence base and concludes there is little potential to accommodate additional charges such as CIL. • Please note only signatories of the Local Planning Authority and those with an interest in the land can be party to such agreements under law.
SD5	Cromer Town Council (1218420)	LP732	General Comments	There is a lack of allocation for social care provision within the local plan. With an aging population, the provision of adequate health and social care is increasingly important	Noted: The responsibility of planning and delivering healthcare lies with the Norfolk & Waveney Sustainable & Transformation Partnership. NNDC is a signatory of the Joint Norfolk Health Protocol. Policy HOU2 outlines the approach to specialist elderly accommodation.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD5)
Objection	0	No comments on the principle of the policy other than the consideration of a further Community Infrastructure levy and more contributions to adult social care.
Support	0	
General Comments	2	

Policy SD6 - Provision & Retention of Local Facilities and Services

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD6	Sheringham Town Council (1217426)	LP548	General Comments	Policy SD6, final paragraph, states that development proposals on designated Health and Social Care Campuses at specified towns will not be permitted unless certain conditions are fulfilled. Sheringham is omitted from the list of towns. Why is this?	Sheringham is a selected settlement and as such the first part of the policy applies. There are no designated health and social care campuses in Sheringham so the final paragraph is considered not to be relevant in this instance.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD6)
Objection	0	Sheringham town council requested the consideration for a health and social care campus. No comments were received on the principle of protection of such sites.
Support	0	
General Comments	1	

Policy SD7 - Renewable Energy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD7	High Kelling Parish Council (1210779)	LP147	Object	North Norfolk actively supports renewable energy with existing on-shore solar and off-shore wind farms. In addition, the proposed Hornsea 3 and Vattenfall wind farms off the Norfolk coast are projected to meet 10%+ of current domestic UK energy demand. The scale of proposed off-shore development is such that there are suggestions to install a ring main at sea rather than separate pipe lines on land for each new wind farm. Support for renewables does not mean approving every development regardless of its impact on the environment and local community and at the expense of a unique landscape and skyline loved and valued by residents and visitors. There is a long-running planning dispute about applications for two wind turbines between Holt and Sheringham just outside the AONB boundary. North Norfolk District Council is be applauded for continuing to object to these turbines. Unfortunately the section in the Local Plan on Renewable Energy and Policy SD7 is depressingly general, offering little specific protection against future inappropriate on-shore wind turbine development. This is surprising in that the North Norfolk Landscape Sensitivity Assessment “found that there are no landscapes in North Norfolk that score ‘low’ or even ‘low-moderate’ sensitivity to commercial wind energy developments” (Observations on Landscape Sensitivity to Wind Energy Development Para 5.8)	Disagree (partly): The policy approach is one that emphasises the importance of the landscape and recognises its sensitivity to wind turbine development of all scales. Offshore development is beyond the scope of this local plan and falls under national significant infrastructure. Permission is however required for proposals that require associated on land infrastructure. The approach has been informed by the 2019 landscape Character assessment and landscape sensitivity Study.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD7)
Objection	1	1 comment received advising that support for renewables should consider landscape and the local community and that the policy approach should offer more prescribed protection.
Support	0	
General Comments	0	

Policy SD8 - Fibre to the Premises (FTTP)

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD8	Hoveton Parish Council (1216265)	LP180	General Comments	Improvements still need to be made to the local communications infrastructure (with unacceptably slow Broadband speeds and poor mobile signals limiting the amount of remote working possible, this may deter businesses from relocating to the local area);	Noted: The Council is working through the Duty to co-operate to maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities are engaging with the telecommunications industry including Mobile UK to produce shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk guidance on the location of base and booster stations for the 5G network, taking into account material planning considerations. Policies SD8 and SD9 set out requirements around fibre to premises and mobile network.
SD8	Cromer Town Council (1218420)	LP732	Support	Employment • As more people work from home there needs to be provision for improved fibre internet connections within the local plan. • A technological hub is required to provide a facility for businesses. • Would like to see planning advice better and more flexibly linked to economic development needs	Noted: Support welcome for the proposed approach around high speed fibre to the premises at first occupation.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD8)
Objection	0	General approach for connection to high speed fibre endorsed.
Support	1	
General Comments	0	

Policy SD9 - Telecommunications Infrastructure

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD9	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD9)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy SD10 - Flood Risk & Surface Water Drainage

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD10	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD10)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy SD11 - Coastal Erosion

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD11	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD11)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy SD12 - Coastal Adaptation

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	
SD12	Sheringham Town Council (1217426)	LP548	General Comments	Condition 2 of the Proposals for the relocation and replacement of dwellings affected by erosion states that new dwelling(s) is/are used as a primary residence. STC's concern is that if the replacement of holiday homes/second homes is not permitted under the policy then this could lead to increased pressure on an already stretched housing supply.	Comments noted: Consider comments in the development the policy.
SD12	Bacton & Edingthorpe (149585)	LP239	Object	Concerned that cliff-top caravan parks to sites within the undeveloped coast would be potentially harmful to the landscape; the policies should provide for the safeguarding of the landscape are essential. This could encroach into the local countryside and conflict with Policy SD4. Designation of Bacton as a Growth Village could potentially limit the future availability of suitable sites for relocation of facilities threatened by coastal erosion.	Disagree, the policy presents a positive approach for long term resilience, community cohesion, enabling adaptation to take place in advance of actual loss. Proposals are required to respect existing character and appearance and accord with wider landscape policies as a whole.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD12)
Objection	1	Issues raised include the need to exclude existing second homes from the policy and exclude caravan parks in the "Undeveloped Coast" where impacts on the landscape are potentially damaging.
Support	0	
General Comments	1	

Policy SD13 - Pollution & Hazard Prevention and Minimisation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD13	Cley Parish Council (1217592)	LP654	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Re comments on reducing light pollution, can we have this more robust, more enforceable? The council suggests developers avoid large glazed area and outside lights unless for security, how is this enforced? Can we have more areas designated as dark sky discovery sites? And how would we enforce this?	Dark skies need to meet strict criteria and be away from local light pollution.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD13)
Objection	0	Cley PC requested more areas designated as dark skies.
Support	0	
General Comments	1	

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Policy SD14 - Transport Impact of New Development

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD14	Sheringham Town Council (1217426)	LP548	General Comments	The Principal Routes shown on the Policies Maps does not include the A149. STC believes it should because funding for buses only has to cover Principal Routes	The Identification of Principle Routes are a matter for the Highway Authority and include the A1082 into the Town.
SD14	Wells Town Council (1212319)	LP098 LP110	General Comments	The Council wishes to draw to the attention of the District Council the disappointing lessening of public transport provision in recent years and its effect on the ability of local people to find work out of town and to readily engage in further education, noting also its effect upon the increase of visitor parking of motor vehicles in the town. 21. The Council wishes to draw the attention of the District Council the urgent need to implement the Council's recent proposals in relation to parking restrictions and other traffic management.	Comments noted.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD14)
Objection	0	Consider adding A149 into Sheringham as a principle route. Concern expressed that poor public transport results in over reliance on cars and parking issues.
Support	0	
General Comments	2	

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Policy SD15 - Parking Provision

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD15	Sheringham Town Council (1217426)	LP548	General Comments	The final paragraph of SD15 states that development proposals that would result in the loss of designated car parks identified on the Policies Map will not be permitted. STC believes this proposed policy is pertinent to the redevelopment of the Shannoeks Hotel in Sheringham because the NNDC proposed CPO and redevelopment plan proposes to develop the car park. STC would like to see the CPO instigated but would also like to see an element of public car parking retained.	Comments noted: CPO's are not a matter for the Local Plan.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD15)
Objection	0	Support expressed for the retention of designated car parks.
Support	0	
General Comments	1	

Policy SD16 - Electric Vehicle Charging

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD16	North Walsham Town Council (1218408)	LP730	Object	Town Council supports the NNDC commitment to meeting the 'climate emergency' and believes that the draft design guidelines need to be amended as below. The provision of charging points by developers in domestic driveways is excellent, but this should be extended to communal parking areas as well, with active charging points provided. (rather than passive)	Support for policy and additional active charging points in communal areas noted and welcomed.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD16)
Objection	1	Principle supported but policy should be amended to include requirement for active provision in communal areas.
Support	0	
General Comments	0	

Policy SD17 - Safeguarding Land for Sustainable Transport

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
SD17	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy SD17)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Environment Policies

Policy ENV1 - Norfolk Coast AONB & Broads National Park

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV1	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV1)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy ENV2 - Protection & Enhancement of Landscape Character

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV2	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV2)
Objection	0	No comments received.
Support	0	
General Comments	0	

DRAFT

Policy ENV3 - Heritage & Undeveloped Coast

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV3	Bacton & Edingthorpe Parish Council (149585)	LP239	Support	A great deal of Bacton is designated "undeveloped coast" . Strong support for the continued operation of this policy, with reference to the area's links to the near-by Norfolk Coast AONB and to the Bacton Gas Terminal.	Support Welcome.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV3)
Objection	0	The policy approach was strongly supported.
Support	1	
General Comments	0	

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Policy ENV4 - Biodiversity & Geology

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV4	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV4)
Objection	0	No comments received.
Support	0	
General Comments	0	

DRAFT

Policy ENV5 - Green Infrastructure

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV5	Cromer Town Council (1218420)	LP732	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More houses means more traffic movement to and from the houses including for example the collection and disposal of waste. Cromer is already a congestion hot spot. • Consideration is required in respect of public transport for people who cannot afford to live in Cromer and have to commute to the town. • Cycleways should be included as part of allocations. It is noted that improvements to the existing cycle routes are not proposed as part of the infrastructure position statement, and this could be a useful addition. • Details and referenced documents indicate that areas in and around Cromer make a significant contribution towards congestion “hot-spots”, though no ongoing actions are proposed to mitigate this in view of further major development. We feel an individual traffic and transport study is a requirement in Cromer to help identify means of mitigating against current congestion and other transport pressures. Footpaths • Northrepps FP16 – There is concern at the impact on biodiversity if this footpath is extended to Roughton Road	Noted: NCC highways have informed the identification of sit options. The impact of traffic generation and cumulative effects have been taken into consideration in setting the distribution and housing numbers. Support for on-site and off-site improvements and improved connectivity for green infrastructure is welcomed. Further requirements are detailed in the Green Infrastructure position statement and policy ENV5.
ENV5	Sheringham Town Council (1217426)	LP548	Support	STC agrees with the proposed policy but would like to see the policy strengthened, particularly with regard to linking green areas and open spaces.	Supported welcomed. Consider comments in the development the policy.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV5)
Objection	0	General support expressed but policy strengthening could be provided around provision of cycleway and linkage between existing open spaces.
Support	1	
General Comments	1	

Policy ENV6 - Trees & Hedgerows

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV6	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV6)
Objection	0	No comments received.
Support	0	
General Comments	0	

DRAFT

Policy ENV7 - Open Spaces & Local Green Spaces

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV7	Cromer Town Council (1218420)	LP732	General Comments	Play equipment • The provision of play equipment and youth provisions needs to be reinforced with a North Norfolk wide plan for provision to ensure we are supporting communities to work smarter and more expediently where limited and time sensitive opportunities for funding arise. Sport Strategy • There needs to be a wider inclusion of other sports and for all abilities	Noted: open space and Children's play equipment are required as part of policy ENV7. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to inform future requirements.
ENV7	Sheringham Town Council (1217426)	LP548	Support	The proposed policy states that development on visually important Open Spaces will not usually be supported. STC would like to see this strengthened. The proposed policy also states that with regard to larger-scale developments, open space facilities will be required. STC would like to be consulted in connection with the location and type of open space to be provided when they are to be sited in Sheringham, which should also be the location for the open space when the corresponding development is in Sheringham.	Comments noted: Consider comments in the development the policy. STC are a consultee on relevant planning applications.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV7)
Objection	0	General support expressed but further strengthening of the policy around play equipment, sports strategy and the requirement to provide better linkages between existing open spaces.
Support	1	
General Comments	1	

Policy ENV8 - Public Rights of Way

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV8	Cley Parish Council (1217592)	LP647	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Cley Parish Council fully support the PROW proposals in the Local Plan. In particular Cley would like to see better connectivity for Public Rights of Way, using permissive paths, footways and new PROW where ever possible to connect and link to adjoining parishes, National Trails and local services. All new development should enhance the current PROW network whilst creating new off road opportunities for walkers, cyclists and horse riders.	Support Noted

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV8)
Objection	0	Support for increased connectivity through connection of public right if ways.
Support	1	
General Comments	0	

Policy ENV9 - High Quality Design

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV9	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV9)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy ENV10 - Protection of Amenity

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV10	Sheringham Town Council (1217426)	LP548	General Comments	STC agrees with NNDC that light and noise pollution arising from new development can have a significantly damaging impact on the countryside and settlements in north Norfolk. Our area boasts some of the darkest skies and this lack of artificial light helps the area retain its rural character. Lighting in new developments should be limited to that necessary for security. Consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky-lights etc.	Comments noted: Consider comments in the development the policy.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV10)
Objection	0	Support expressed for the inclusion of external light considerations.
Support	0	
General Comments	1	

Policy ENV11 - Protecting and Enhancing the Historic Environment

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV11	Cley Parish Council (1217592)	LP648	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More should be done to preserve heritage assets such as flint walls. Cley has a number of important ancient flint walls which are slowly getting replaced in association with minor development proposals such as extensions etc. Cley wishes to enhance and protect its historic environment, more effort needs to be done to protect flint walls which are affected by development.	Noted: The Council is supportive of Local communities bringing forward non strategic policies which add / address local distinction through neighbourhood planning

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV11)
Objection	0	More effort needs to be done to protect flint walls which are affected by development.
Support	0	
General Comments	1	

Housing Policies

Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU1	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerns re increase in traffic and impacts on quality of life of the parish of bacton including increased visitor pressure on bacton woods/ Witton woods- Inflating housing target in North Walsham just to reach infrastructure thresholds deprives other areas of the District of the ability to address infrastructure deficiency and represents an disproportionate amount of growth in the east. Targeting North Walsham to take so much of the bulk of the housing target, together with a disproportionately high density of growth villages in our part of the district, represents a poor attempt at forward planning, likely to have an unfairly detrimental impact on the geography of this part of the district, and quality of life of existing residents.	Noted: The distribution of growth is informed by the guiding principles of the NPPF , including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing , jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
HOU1	Blakeney Parish Council (1215955)	LP272	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Second Homes and change of use from residential to holiday accommodation - We would like these to be subject to a change of use application. Second Homes - We would like to see them levied with a higher Council Tax, which then goes back into the village, towards new affordable housing for local people. New Development - We would like new properties to be solely used as principle dwellings only, no new additional second homes. Local Employment	Noted: Use classification is a matter for law and is outside the scope of current land use planning. The Council is actively supporting the provision of rural exception sites and affordable housing provision through grant funding and working with local communities in the identification of and delivery of sites to address local need. Such sites can also be brought forward through the emerging neighbourhood plan. The use of a second home is not defined in planning legislation, the occupation of residential dwellings is not a matter of land use planning and there are no planning controls that can be utilised to control the use of the existing housing stock as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. Blakeney is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers where there is an opportunity to bring

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					forward additional growth in response to local issues and evidence.
HOU1	Cley Parish Council (1217592)	LP646 LP650 LP655	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Need to build 11 k houses to deal with future population growth, but this is largely driven by inward migration, not by growth of the existing North Norfolk population. What do we need to build to serve the needs of the local population? Why aren't we building just to cover these needs? Inward migration may change eg with the economy, so is it wise to base large future housing numbers on this factor? If all these new homes are built, how can the council as it aspires still provide increased access to the countryside and protect the environment? North Norfolk's economy is largely based on tourism, and this will be impacted by the effect of the new housing on our natural surroundings. North Norfolk will be a less attractive place to visit. Also, What about the impact of the new housing on the infrastructure visitors use, eg the roads. - States historically windfall development has provided a substantial number of homes and there is no evidence to say this will decrease, but they are reducing your expectation by 50%. What is the basis for this? Surely windfall development reduces the number of new homes needing to be built. - Healthcare, parking and education are all constraints in Holt. How are these going to be tackled? For instance 330 more homes requires more doctors, how will this be achieved?</p>	Noted: Plans should be positively prepared to meet all development needs as a minimum. The Council is supportive of Local communities bringing forward additional growth to support local identified need through neighbourhood planning. The housing numbers make an allowance for windfall development.
HOU1	Northrepps Parish Council (1218479)	LP789	Object	Members do not support the need for any additional housing in Cromer. If more housing is actually required, brownfield sites should be developed and empty properties brought back into use before any additional housing is considered especially in the countryside and the AONB. • Members noted the comments put forward by CPRE	Disagree: The housing target and distribution of growth is informed by the guiding principles of the NPPF, including the NPPF's aims of boosting significantly the housing supply and with regard to level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. This includes through planning making sufficient provision for housing ,including affordable housing. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					by local factors including environment constraints. Further detail is published in background paper 2. Cromer itself functions as a higher order town and provides significant housing , employment and services to residents of the town and District.
HOU1	Wells Town Council (1212319)	LP098 LP103	Support	The Council accepts the allocation of eighty dwellings for the town as part of its share of government housing requirements for the District. The Council supports the building of affordable housing over the plan period up for the full number remaining as required by the District	Support noted. The Council considers it important to retain land supply solely for employment uses.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU1)
Objection	1	Issued raised include: The over-concentration of growth in North Walsham impacts on the ability of other more remote areas to improve infrastructure, brownfield sites should be used first, growth should be principle homes only and growth is not supported in Cromer. The allocated numbers in Wells are supported. One parish Council questioned the housing number methodology, the impacts of windfall and the effects in service provision.
Support	2	
General Comments	3	

Policy HOU2 - Housing Mix

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU2	Cromer Town Council (1218420)	LP732	General Comments	Policy needs to be firmed up to ensure that affordable homes are maintained in perpetuity. • Community led housing is supported.	Noted: Affordable housing by definition is required to remain at an affordable price for future eligible households.
HOU2	Sheringham Town Council (1217426)	LP548	General Comments	STC would like to see an agreed percentage of houses in all new large-scale developments reserved for permanent occupancy	Noted. Use classification is a matter for law and is outside the scope of current land use planning.
HOU2	Cromer Town Council (1218420)	LP732	General Comments	There is a lack of allocation for social care provision within the local plan. With an aging population, the provision of adequate health and social care is increasingly important	Disagree. The Council aims to ensure that a proportion of all new homes built are suitable and easily adaptable for occupation by the elderly and infirm through policy HOU8 and makes specific provision for those that require specialist care through policy HOU2.
HOU2	North Walsham Town Council (1218408)	LP730	Object	There is no mention in the draft of social housing. Given the long waiting list for such housing at present the Town Council strongly believes that up to 30% of housing be affordable. At least 50% of this must be Social Housing (15% of total housing) to help alleviate the current and future waiting lists. The Town Council believes that Social Housing should be distributed throughout the developments and not congregated in a single area	Disagree: Policy HOU2 details the affordable housing requirements. Evidence contained within the Strategic Housing Needs Assessment identified a need for 2,000 affordable homes to be developed each year and continues to demonstrate there is an annual need for 100 dwellings a year. The Standard Housing assessment methodology on housing need introduced in 2018 includes an uplift to address the high affordability to house price ratio and is reflected in the housing target.
HOU2	Sheringham Town Council (1217426)	LP548	Support	STC agrees with the proposals outlined in the Plan and believes the greater demand for affordable housing is from prospective renters/purchasers for 2 or 3 bedroomed dwellings but particularly for rented properties and accordingly this is what developers would be encouraged to build. This is not included in the plan and STC believe this is essential and reflects the views of our community	Agree: consider feedback in the development of the policy. The Strategic Housing Market Assessment identifies strong need for affordable; rented properties.
HOU2	Wells Town Council (1212319)	LP098 LP102	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Council wishes to draw attention to the importance of a good quality of services and facilities for residents of the town, the importance of school provision, health care and emergency services	Partial support noted. Consider comments in the development the policy. The Council has used current

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
Page 328		LP104 LP105		and of housing for their providers and asks that they be explicitly included in the considerations of the District Council. Sustainable Development . The Council wishes the town to be developed sustainably with a healthy demographic balance for future generations in accordance with government guidelines (NPPF). The Council endorses the encouragement of Community Land Trusts (Homes for Wells) and Neighbourhood Plans. (LP 7.12). The Council wishes local plan policies explicitly to include provision for families, for local people as well as the elderly, those unable to live at home and those working in the town. (LP 9.24-30) Housing The Local Plan states its purpose as ensuring that sufficient homes of the right type are built in the right place and at the right times to meet all of the accommodation needs of the town as identified in the most up-to-date evidence. (LP 9.1) It states that affordable homes need to be genuinely affordable to those with lower incomes but recognises that rented accommodation will be the main form of affordable tenure. Given the topography of the town, any building would have to be on the edge of the built area. The Council supports the proposal that a 'significant proportion' of new homes shall be affordable and not be available for second home use (LP 9.5). The Council supports the idea of second homes' occupancy restrictions in order to make possible the buying of property by locals. The Council is of the view that in order for the town to function effectively as a strong and vibrant community those who need to live reasonably close include not only teachers, medical and care staff and those who man emergency services but also those who provide for the needs of tourists as well as residents' needs	evidence base and engaged with relevant bodies including health and education bodies to identify where additional social infrastructure may be required as a result of new development. The Council welcomes the recognition that towns should grow sustainably and the support for the policy approach which address the need for small scale family homes, sets the viable affordable home percentage and requires specialist elderly accommodation on larger scale sites.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU2)
Objection	1	Issues raised include: Affordable homes need to be in perpetuity, the approach to community housing is supported, approach to health and social care with regard elderly people needs more emphasis. Provision of social homes should be stipulated. There was however support expressed for the approach outlined in the policy. One respondent indicated that a further policy on type and tenure requirements would strength the overall approach and add clarity.
Support	2	
General Comments	3	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU3	Bacton & Edingthorpe Parish Council (149585)	LP239	Support	Broadly expressing support for this policy.- policy is also an alternative to “Growth Village” designation.	Support noted. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community.
HOU3	Cley Parish Council (1217592)	LP651	General Comments	OFFICER SUMMARY: SEE ATTACHED FILE FOR FULL SUMMARY: Some confusion on how housing need is calculated. We would welcome more information on this	A full explanation is included in background paper 1 which is published on the NNDC web site along with the consultation material

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU3)
Objection	0	Broad support expressed for this approach.
Support	1	
General Comments	1	

Policy HOU4 - Agricultural & Other Key Worker Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU4	Wells Town Council (1212319)	LP098 LP101 LP106	Support	The Council is of the view that in order for the town to function effectively as a strong and vibrant community those who need to live reasonably close include not only teachers, medical and care staff and those who man emergency services but also those who provide for the needs of tourists as well as residents' needs. The Council wishes to express its concern that those applying for key local jobs from outside the town are deterred from doing so because of the price of housing.	Noted: Consider comments in the development the policy,(key workers).

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU4)
Objection	0	Broad support expressed but the approach could be expanded to cover key workers first in the towns and not just focus on those connected to the land.
Support	1	
General Comments	0	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU5	N/A	N/A	N/A	No comments received.	N/A

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

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Policy HOU6 - Replacement Dwellings, Extensions & Annexed Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU6	Cley Parish Council (1217592)	LP652	General Comments	Policy HOU6, they say extensions, replacement dwellings should not materially increase the impact on the environment. How are they putting this into practice as there is plenty of evidence this policy isn't being taken into account. More value needs to be placed on the impact on the environment	Policies can be enforced when there is a breach of a condition
HOU6	Sheringham Town Council (1217426)	LP548	General Comments	STC would like NNDC to consider that new extensions to existing dwellings are likely to increase the capital or rental value of those dwellings, thereby making it harder for a first-time buyer or renter to acquire that property.	Noted. STC should be aware that not all extensions require an application for planning permission due to permitted development rights laid down by national policy.
HOU6	High Kelling Parish Council (1210779)	LP147	Object	HOU6 & HOU7 High Kelling Parish Council consider the protection against over-development offered by these policies too vague, for example, HOU 6 that a proposal "would not materially increase the impact....." . Similarly, the definition of infilling is open to wide interpretation. A permissive attitude to infill and small developments - a house here, an exclusive development squeezed in there - is precisely how, over a period of time, the character of a small village is eroded or the unique nature of the countryside and AONB is undermined. That these policies need to be made more explicit in terms of, for example, design, footprint, height, scale, volume and materials in order to ensure that extended, replacement or re-used dwellings do not overwhelm neighbouring properties or the countryside. 2. We also suggest that infilling should be defined more precisely and that replacement should normally be on a one-for-one basis and that multiple dwellings on a plot previously occupied by one should be permitted only in exceptional circumstances.	Noted: Consider comments in the development the policy approach.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU6)
Objection	1	Allowing extensions to properties makes it harder for first time buyers to purchase a property. More value should be placed on the environmental impacts. Another objected that the policy should be more prescriptive and ensure extension and infill development are of appropriate (small scale) footprint restrictions, height. Specifically replacement dwellings should be restricted to one on a plot to avoid over intensification.
Support	0	
General Comments	2	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU7	High Kelling Parish Council (1210779)	LP147	Object	HOU6 & HOU7 High Kelling Parish Council consider the protection against over-development offered by these policies too vague, for example, HOU 6 that a proposal "would not materially increase the impact.....". Similarly, the definition of infilling is open to wide interpretation. A permissive attitude to infill and small developments - a house here, an exclusive development squeezed in there - is precisely how, over a period of time, the character of a small village is eroded or the unique nature of the countryside and AONB is undermined. That these policies need to be made more explicit in terms of, for example, design, footprint, height, scale, volume and materials in order to ensure that extended, replacement or re-used dwellings do not overwhelm neighbouring properties or the countryside. 2. We also suggest that infilling should be defined more precisely and that replacement should normally be on a one-for-one basis and that multiple dwellings on a plot previously occupied by one should be permitted only in exceptional circumstances.	Noted. Consider comments in the development the policy approach.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU7)
Objection	1	Considered the policy is too vague.
Support	0	
General Comments	0	

Policy HOU8 - Accessible & Adaptable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU8	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU8)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy HOU9 - Minimum Space Standards

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU9	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU9)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy HOU10 - Water Efficiency

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU10	North Walsham Town Council (1218408)	LP730	Support	We recommend that the 110 litres/person/day is applied across the NNDC	Support for the policy approach is welcomed
HOU10	Cley Parish Council (1217592)	LP653	Support	OFFICER SUMMARY: SEE ATTACHED FILE FOR FULL SUMMARY: Fully Support water efficiency proposal	Support welcomed
HOU10	Cromer Town Council (1218420)	LP732	Support	We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.	Noted: Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU10)
Objection	0	Support for prescriptive water efficiency targets.
Support	3	
General Comments	0	

Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU11	Sheringham Town Council (1217426)	LP548	General Comments	<p>STC would like to see NNDC attempt to reduce the impacts of Climate Change through the planning system. The existing 'Merton Rule' which ensures all new commercial buildings create at least 10% of their energy from renewables is out-of-date. A new rule could set staged targets for efficiencies of energy, carbon removal, water reduction and waste recycling. This new rule could be designed into planning permissions/conditions. • There needs to be an approach to local planning that addresses the Climate Emergency that has been declared by NNDC and STC. An environmental impact assessment needs to be conducted and implemented as to the environmental impact of the local plan including the design guides in order to address the concerns of councils and our community, which have led to the declaration of a Climate Emergency. As a result STC expect to see NNDC reduce the impacts of climate change through the planning system. The existing 'Merton Rule', which ensures all new commercial buildings create at least 10% of their energy from renewables is out of date. A new rule could set staged targets for efficiencies of energy, carbon removal, water reduction and waste recycling. This new rule should be designed into planning permissions and conditions. Sheringham Town council expects NNDC to uphold and enforce those climate related principles and rulings in the process of approving planning applications.</p>	<p>Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. • The Local Plan is informed by a sustainability appraisal which reviews the key environmental, social and economic considerations that affect the District</p>
HOU11	Cromer Town Council (1218420)	LP732	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The "Merton Rule" was established in 2003 to ensure that all commercial buildings have to create at least 10% of their energy from renewables. This is old hat. Renewables are far less expensive and much more available than in 2003 so such a rule needs both to be upgraded and considerably widened. We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy</p>	<p>Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.	efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design.
HOU11	North Walsham Town Council (1218408)	LP730	Object	The Town Council also believes that careful attention should be given to roof orientation within the proposed developments in order to maximise the efficient generation of solar energy. We suggest that rainwater harvesting should be required, not simply recommended. Amend Rainwater harvesting: This is the collection of water that would otherwise have gone down the drain, into the ground or been lost through evaporation. Large surfaces such as roofs and driveways are ideal for rainwater harvesting. Generally green roofs do not provide as much harvesting potential as traditional roofing materials, so the use of rainwater harvesting and green roofs on the same building requires careful consideration. This water is not suitable for drinking but can be used for flushing toilets, watering gardens and even supplying the washing machine. Rainwater harvesting has the potential to save a large volume of mains water and therefore help reduce the pressure on water resources. Water butts to supply garden watering requirements are the simplest form of rainwater harvesting system, their installation is required in all new dwellings	Consider comments in the finalisation of the policy.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU11)
Objection	1	Support for more prescription in setting targets around energy efficiency and carbon reduction in order to address climate change. Objection on the grounds that the policy should be more prescriptive around roof orientation and priority to grey water recycling systems rather than green roofs and water storage/ runoff capabilities.
Support	0	
General Comments	2	

Economy Policies

Policy ECN1 - Employment Land

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN1	Sheringham Town Council (1217426)	LP548	General Comments	The table on P. 143 shows Sheringham has 3.95ha of existing employment land which STC would like retained as proposed in this Plan.	Noted: The Local Plan proposes to retain the existing designated employment area
ECN1	Wells Town Council (1212319)	LP098 LP109	Support	The Local Plan comments on the dominance of tourism as the major employer, the decline of agriculture and manufacturing in the area. (LP 5.6-8). The Council wishes to encourage the continued sensitive development of the Harbour as an employer and provider of facilities for fishing, wind farm support and leisure boating. The Council wishes to draw to the attention of the District Council the need to develop existing industrial sites identified on the map (page 265).	Support noted. The Council considers it important to retain land supply solely for employment uses.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN1)
Objection	0	Support expressed to develop existing industrial sites and development of the harbour in Wells.
Support	1	
General Comments	1	

Policy ECN2 - Employment Areas, Enterprise Zones & Former Airbases

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN2	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN2)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy ECN3 - Employment Development Outside of Employment Areas

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN3	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN3)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Policy ECN4 - Retail & Town Centres

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN4	Cromer Town Council (1218420)	LP732	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Concern that some shops are not within the commercial area. ALL shops need to be included within the primary shopping area. This includes the East End of Cromer from Church Street to the junction with Overstrand Road, the western end of Overstrand Road, Bond Street, Louden Road and Mount Street. Public Art • Public art should be positively encouraged more than it is in the draft. We should be working towards securing contributions towards public art from developments, and the provision of public art on new open space	Consider comments in the development the policy approach. The primary shopping area is a defined area where retail development is concentrated, the Town centre boundary is defined as the PSA and areas that predominantly occupied by "main town centre" uses within or adjacent to the PSA. Consider revising PSA to include east of Church Street towards Overstrand Road
ECN4	Sheringham Town Council (1217426)	LP548	General Comments	STC notes that S. 10.35 proposes Sheringham is a smaller town centre to complement the larger town centres in the district. However, STC considers it imperative that Sheringham continues to offer year-round retail facilities with a wide range of outlets. The Table shows the Projected new retail floor space requirement 2016-2026 for Sheringham with 588sqm for Convenience Goods, 457sqm for Comparison Goods and 268sqm for Food and Beverage. STC is keen to limit the development of food and beverage floor space in favour of other retail use and therefore would like to see these projections adhered to through the planning process. The designated Town Centre boundary includes the north end of High Street which contains a number of retail and leisure outlets. However, the designated Primary Shopping Area does not include this area. STC would like the red line of the Primary Shopping Area extended northwards to include both sides of High Street.	Noted. Proposals for retail development at an appropriate scale will be supported provided that they reflect the identified capacity to support growth established through the most up to date evidence and in line with impact thresholds put forward through policy ECN4. • Consider comments in the development the policy approach, the primary shopping area is a defined area where retail development is concentrated, the Town centre boundary is defined as the PSA and areas that predominantly occupied by "main town centre" uses within or adjacent to the PSA. Consider revising PSA to include the northern end of the highstreet.
ECN4	North Walsham (1218408)	LP730	Object	The Town Council recognises that the Town Centre is very fragile, and initiatives are in progress to improve this situation. The Town Council also believes that the primary shopping area needs to be protected from residential conversions and other losses, such that it has capacity to serve the likely future specialist shops, social and entertainment needs of the expanded town that are implied in the Local Plan. The Town Council suggest this protection should also include the retail units in Mundesley Road, Vicarage Street and Kings Arms Street, as highlighted in green in the plan attached.	Consider inclusion of retail units and main town centre uses as suggested in the finalisation of the PSA and TC boundary and policy ECN4 - the defined area where primary retail development is concentrated. The primary shopping area is a defined

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					area where retail development is concentrated, the Town centre boundary is defined as the PSA and areas that predominantly occupied by "main town centre" uses.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN4)
Objection	1	The town council would like further consideration of an extension to the primary shopping area to the north end of the High Street in Sheringham. In North Walsham the town council would like the PSA extended to include retail units in Mundesley Road, Vicarage Street and Kings Arms Street. In Cromer it was also suggested that the PSA should be expanded to cover all streets where there are retail shops. contributions for public art where supported by one respondent.
Support	0	
General Comments	2	

Policy ECN5 - Signage & Shopfronts

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN5	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN5)
Objection	0	No comments received.
Support	0	
General Comments	0	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN6	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerned that cliff-top caravan parks to sites within the undeveloped coast would be potentially harmful to the landscape; the policies should provide for the safeguarding of the landscape are essential. This could encroach into the local countryside and conflict with Policy SD4.	Noted: The policy approach calls for net benefits in terms of ant landscape and ecology when compared to existing business.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN6)
Objection	0	Caravan development on cliff tops was not supported due to concerns around impacts on the landscape.
Support	0	
General Comments	1	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN7	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerned that cliff-top caravan parks to sites within the undeveloped coast would be potentially harmful to the landscape; the policies should provide for the safeguarding of the landscape are essential. This could encroach into the local countryside and conflict with Policy SD4.	Noted: Consider comments in the development the policy approach. The policy approach calls for no significant detrimental impacts in the areas landscape. ECN6 however calls for net landscape gain. Both policies should be reviewed for consistency along with SD11/12 Coastal adaptation.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN7)
Objection	0	Caravan development on cliff tops was not supported due to concerns around impacts on the landscape.
Support	0	
General Comments	1	

Policy ECN8 - New Build & Extensions to Tourist Attractions

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN8	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN8)
Objection	0	No comments received.
Support	0	
General Comments	0	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN9	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN9)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Vision, Aims & Objectives

Vision, Aims & Objectives

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
Vision & Aims	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Vision & Aims)
Objection	0	None received.
Support	0	
General Comments	0	

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First Draft Local Plan (Part 1) Comments

Comments on Proposed Sites

(Submitted by Parish & Town Councils)

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Town & Village Proposals

DS1: Proposed Allocations

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS1	N/A	Cromer Town Council (1218420)	LP732	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Phasing of housing is not specifically offered as an option within the documentation. We consider that there is no reason why new sites allocated in the Local Plan should not be phased. They would then be available for development should building rates increase and the vast majority of existing allocated sites are built out, but if house completions remain at existing rates these newly allocated sites could stay on a reserve list and valuable countryside would be protected. This would be particularly important if Government predictions of population and household growth are reduced further. - Brown field sites should be prioritised.	Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. - The Council has looked firstly at previously used land and buildings within settlements, secondly at suitable infill sites and thirdly at other land which is well located for housing, jobs, services and infrastructure.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS1)
Objection	0	Would like to see more phasing of site.
Support	0	
General Comments	1	

Proposals for Cromer

DS2: Land at Cromer High Station

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS2	C07/2	Cromer Town Council (1218420)	LP732	General Comments	Concerns pedestrian safety and access and connectivity across the Station Road junction and Norwich Road, particularly if additional public transport infrastructure is proposed as part of any allocation. • A contribution to play equipment for Fearn's Park via S106 arising from any development is requested. • Affordable housing on this site needs to be held in perpetuity.	Concerns noted: The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements. Play equipment and open space provision is required to be provided in line with emerging policy ENV7. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to inform future requirements.
DS2	C07/2	Northrepps Parish Council (1218479)	LP789	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Members have looked at all of the options for Cromer do not support the need for any new sites. • There are empty properties in Cromer which should be brought back into use and any brownfield sites developed before new sites are considered. • If any new housing is allocated the infrastructure needs to be in place before any sites are occupied. This includes healthcare, road network, utilities etc. • The road system in Cromer cannot cope with current demands and needs to be reviewed. Traffic on the A149 queues back to Northrepps in the summer months. If additional housing for Cromer is built, the traffic levels will increase on the roads into the town which will also increase the levels of CO2. This will be further increased by visitors traveling from the surrounding towns for which there are also new developments proposed. • It was suggested that Cromer needs to think outside the box and be radical in respect of traffic management. Maybe even banning all non residential traffic from the town centre with the introduction of out of town car parks and a shuttle bus service. • There is already a strain on the utilities with properties on the outskirts of Cromer regularly dealing with low water pressure. • Healthcare in Cromer is currently under strain with patients having to wait up to a month for doctors' appointments. The Local Plan indicates that Cromer has an ageing population and that in the future 40% of people in North Norfolk will be over 65. Provision for adequate health and social care must be in place before any additional housing is built. • Concern re the impact of these developments on the countryside and in particular the AONB especially with the loss of mature trees and hedgerows. • Previous responses to planning applications for the Land at Pine Tree Farm (P0/18/2169), Land at</p>	The Council has used current evidence base and engaged with relevant bodies including Highways and infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					Roughton Road (P0/18/1551) and Land at Cromer High Station (P0/19/0281) still stand and can be taken as responses to each site. •C07/2 - Land at Cromer High Station Members of Northrepps Parish Council stand by their previous objections: • The access onto Norwich road is already difficult especially in the busy summer months. Members feel that the increased number of vehicles from the development will make exiting this site and also nearby Station Road even more hazardous, particularly when turning right towards Cromer. Concern was also raised that the road passes several existing businesses which attract many customers/patients to the site. Pedestrian safety must also be ensured. • A resident has advised that there are rare orchids on the site which should be protected. • The Parish Council has also been made aware that the water pressure in this area is very unreliable and are concerned that the additional housing would add extra pressure to the water supply.	

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS2)
Objection	1	Both raised concerns re access while one objected to the principle that the site and Cromer accommodate growth due to the existing infrastructure constraints of the town.
Support	0	
General Comments	1	

DS3: Land at Runton Road / Clifton Park

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS3	C10/1	Runton Parish Council (1210204)	LP035	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:” It is important to be aware that this land lies in the Parish of Runton and NOT in the town of Cromer. Indeed it provides a break between the two authorities and prevents a continuous series of housing developments along the coast road. The site is bordered by a sewage works, two roads and a railway line. The former, in particular, is almost by definition a less than desirable neighbour, given the nature of its operations. With the existing highways infrastructure, the increase in vehicular traffic through both East Runton and Cromer can only exacerbate current difficulties. A proposal to build a two form entry Primary School flies in the face of known existing capacity in the current educational establishments, more so, given the recent County Council investment at Suffield Park Infants and Nursery School. Indeed the District Council’s attention was drawn to this and previous anomalies when this site was postulated in the last Local Plan consultation. In any event it seems more probable that any increase in pupil numbers would derive from developments at the opposite end of Cromer. The Parish Council believes that it is important to preserve “open space” along a tourist route and opposite the sea- shore, to maintain the differentiation between town and village and avoid urbanisation in a tourist area. The District Council’s Notice of Decision in relation to an application by Noble Properties in 2004 to develop this site delineates a number of still valid reasons why this piece of land should not be built upon. Same issues raised in Rep no LP 036.</p>	Noted. Consider comments in the development the policy. The Council has fully engaged with key service providers to identify the likely impacts of development. This includes highways, water and sewerage and the Education authority and continues to do so. These issues have been taken into account in site assessments.
DS3	C10/1	Cromer Town Council (1218420)	LP732	Object	<p>Concern on the impact on East Runton as a nucleated village. • This land is a natural barrier between Cromer and East Runton. • There needs to be a proper evaluation of biodiversity of this site before it is considered for the Local Plan. • There also needs to be a consideration of its current use, essentially as an area of ‘open space’. • Cromer Town Council would prefer this site to be withdrawn</p>	<p>The Council will take into account consultation feedback from bodies such as Norfolk County Council, Norfolk Wildlife Trust and Natural England to inform decisions regarding the likely impact of developing a site for biodiversity and geodiversity and continue to work with site promoters in the identification in relation to biodiversity and geodiversity features. Mitigation measures will be a requirement to offset any potential adverse impact. The Amenity Green Space Study has been used</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
						to inform decisions on the designation of land as open space.
DS3	C10/1	Northrepps Parish Council (1218479)	LP789	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Members have looked at all of the options for Cromer do not support the need for any new sites. • There are empty properties in Cromer which should be brought back into use and any brownfield sites developed before new sites are considered. • If any new housing is allocated the infrastructure needs to be in place before any sites are occupied. This includes healthcare, road network, utilities etc. • The road system in Cromer cannot cope with current demands and needs to be reviewed. Traffic on the A149 queues back to Northrepps in the summer months. If additional housing for Cromer is built, the traffic levels will increase on the roads into the town which will also increase the levels of CO2. This will be further increased by visitors traveling from the surrounding towns for which there are also new developments proposed. • It was suggested that Cromer needs to think outside the box and be radical in respect of traffic management. Maybe even banning all non residential traffic from the town centre with the introduction of out of town car parks and a shuttle bus service. • There is already a strain on the utilities with properties on the outskirts of Cromer regularly dealing with low water pressure. • Healthcare in Cromer is currently under strain with patients having to wait up to a month for doctors' appointments. The Local Plan indicates that Cromer has an ageing population and that in the future 40% of people in North Norfolk will be over 65. Provision for adequate health and social care must be in place before any additional housing is built. • Concern re the impact of these developments on the countryside and in particular the AONB especially with the loss of mature trees and hedgerows. •</p>	The Council has used current evidence base and engaged with relevant bodies including Highways and infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS3)
Objection	3	Town and adjacent Council's raised issues based around coalescence of settlement, impacts on existing informal use of open space and biodiversity. Concerns raised re impacts on highway network capacity. Education provision was challenged as unnecessary.
Support	0	
General Comments	0	

DS4: Former Golf Practice Ground

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS4	C16	Cromer Town Council (1218420)	LP732	General Comments	Concern over draining and flooding at this site. • Proper soil investigations are needed before this site is considered. • Concern at the impact on biodiversity.	The Council has engaged fully with the Environment Agency and other relevant key professional bodies/persons. It has used the most up-to-date flood risk evidence base in order to identify the likely flood risk of sites. Mitigation measures will be a requirement to offset any potential adverse impact (for example the need for Sustainable Urban Drainage Systems).
DS4	C16	Northrepps Parish Council (1218479)	LP789	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Members have looked at all of the options for Cromer do not support the need for any new sites. • There are empty properties in Cromer which should be brought back into use and any brownfield sites developed before new sites are considered. • If any new housing is allocated the infrastructure needs to be in place before any sites are occupied. This includes healthcare, road network, utilities etc. • The road system in Cromer cannot cope with current demands and needs to be reviewed. Traffic on the A149 queues back to Northrepps in the summer months. If additional housing for Cromer is built, the traffic levels will increase on the roads into the town which will also increase the levels of CO2. This will be further increased by visitors traveling from the surrounding towns for which there are also new developments proposed. • It was suggested that Cromer needs to think outside the box and be radical in respect of traffic management. Maybe even banning all non residential traffic from the town centre with the introduction of out of town car parks and a shuttle bus service. • There is already a strain on the utilities with properties on the outskirts of Cromer regularly dealing with low water pressure. • Healthcare in Cromer is currently under strain with patients having to wait up to a month for doctors' appointments. The Local Plan indicates that Cromer has an ageing population and that in the future 40% of people in North Norfolk will be over 65. Provision for adequate health and social care must be in place before any additional housing is built. • Concern re the impact of these developments on the countryside and in particular the AONB especially with the loss of mature trees and hedgerows.</p>	The Council has used current evidence base and engaged with relevant bodies including Highways and infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS4)
Objection	1	One objection on the principle that the site and Cromer accommodate growth due to the existing infrastructure constraints of the town. A further general comment was received raising the attention of Officers to matters of flooding on the site.
Support	0	
General Comments	1	

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DS5: Land West of Pine Tree Farm

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS5	C22/1	Cromer Town Council (1218420)	LP732	General Comments	Concern due to highways impact. • Concern to lack of continuous footways towards Town Centre and schools. • Concern at the constraints which need to be mitigated in terms of off site highways impact and pedestrian safety. • Concern at the potential impact on mature trees	The Council has fully engaged with key service providers to identify the likely impacts of development for local highways, water, and sewerage and energy networks. These issues have been taken into account in site assessment.
DS5	C22/1	Northrepps Parish Council (1218479)	LP789	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: C22/1 - Land West of Pine Tree Farm Northrepps Parish Council raises strong objections to this application for the following reasons: • impact on the AONB with the loss of an area of open countryside, disturbance to wildlife and light pollution from the floodlights and streetlights. • impact of increased traffic movements to and from the football club and the housing development on a busy road. It is already very difficult to exit from the side roads onto the A149 especially in the summer months. Should any development proceed, the speed limits should be reduced to 30mph along Crossdale Street and Norwich Road. A proper traffic plan is required before there are any new developments. • concern in respect of the narrowing of the roadway over the railway bridge. • concern for the safety of pedestrians, especially children, walking to and from the sports facility along this busy road. • loss of farmland. • impact on already stretched utilities. Residents report that the water pressure in this area is already low and there is a concern that additional housing will cause further problems on the water supply. Concern about the impact on the sewerage system. • concern re the additional pressure on schools, doctors surgery and care providers. The infrastructure needs to be in place before any houses are occupied. • there is a need for more affordable housing particularly for key workers.	The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements. Mitigation measures will be a requirement to offset any potential adverse impact. The Council continues to work with Anglian Water to identify and address network issues. • The Council has engaged with Health and Education providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth.

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Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS5)
Objection	1	Objected to the principle that the site and Cromer accommodate growth due to the existing infrastructure constraints of the town. A further general comment was received raised general concerns around the pedestrian connectivity and off site highway mitigation along with the potential impact on mature trees.
Support	0	
General Comments	1	

Proposals for Fakenham

DS6: Land North of Rudham Stile Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS6	F01/B	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS6)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS7: Land at Junction of A148 & B1146

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS7	F03	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS7)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS8: Land South of Barons Close

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS8	F10	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS8)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Proposals for Holt

DS9: Land South of Beresford Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS9	H04	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS9)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS10: Land North of Valley Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS10	H17	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS10)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS11: Land at Heath Farm

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS11	H20	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS11)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS12: Land at Heath Farm (Employment)

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS12	H27/1	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS12)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Proposals for Hoveton

DS13: Land East of Tunstead Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS13	HV01/B	Hoveton Parish Council (1216265)	LP180	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: would prefer to see Hoveton’s proposed land allocation (and the approximately 150 dwellings the allocation seeks to deliver) split between several smaller sites, in a holistic, integrated approach to local development, rather than this allocation being fulfilled through the single large development. The Parish Council would like to seek assurances, however, that should this change be made, the percentage of dwellings classified as affordable housing within this allocation would remain unchanged. - Hoveton Parish Council has previously been advised that the already approved new developments at Church Field (25 homes) and Tilia Business Park (28 homes) would be included in Hoveton’s housing allocation and that, with the approval of these two developments, Hoveton had already begun working towards its First Draft Local Plan housing allocation. The Parish Council notes, however, that the First Draft Local Plan does not mention these two developments. Hoveton Parish Council believes that these pre-approved developments should count toward the fulfilment of Hoveton’s housing allocation and the Parish Council seeks assurances and confirmation from NNDC that this is the case. Hoveton Parish Council has serious concerns about the inevitable increase in traffic that will arise as a result of the proposals included in the First Draft Local Plan, and about the impact of this extra traffic on an already stretched local road system and on the health and wellbeing of local residents. - A recent study showed half a million vehicle movements passing through the villages of Hoveton and Wroxham in just over two months. While there are many practical problems posed by such congestion – traffic queues causing long delays in entering and leaving the villages; difficulties for residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc. – of particular concern is the noise pollution and air pollution resulting from this level of traffic, which has a serious impact on local quality of life. - Hoveton Parish Council has serious concerns about a number of unresolved problems with the local sewerage network and about this network’s ability to cope with further local development. - In addition, Hoveton has experienced many problems in recent years with surface water flooding on roads within the parish, making some key routes impassable at times, and</p>	<p>Noted: Consider comments in the development of the policy. Plan making is iterative. The settlement commitments and completions table in HOU1 takes into consideration live permissions and commitments and is a point in time. Affordable housing policy is informed by Plan wide viability study and the requirements including thresholds are set out in policy HOU2. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion, access arrangements and cumulative growth. Mitigation measures will be a requirement to offset any potential adverse impact. The Council continues to work with Anglian Water to identify and address network issues. The Council has used current evidence base and engaged with relevant bodies including health and education bodies to identify where additional social infrastructure may be required as a result of new development.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					creating dangerous and difficult conditions for road users and pedestrian. - Hoveton Parish Council has serious concerns about local infrastructure and its ability to cope with further large-scale development, such as that proposed within the First Draft Local Plan. - concerns of many local residents that a growing population caused by overdevelopment will seriously impact on residents' access to quality health care, education, and many other vital local services, thereby impacting on the quality of life offered within the local community. Hoveton and Wroxham's medical centre and other local healthcare services are already under pressure, and the Parish Council fears that a population increase from further housing development such as that proposed here would only exacerbate the problems being experienced by local residents trying to access timely, quality health care. Similarly, the Council fears that an increase in demand for places at local schools will prove unsustainable unless a sufficient supply of school places goes hand-in-hand with the proposed housing development	
S13	HV01/B	Hoveton Parish Council (1216265)	LP180	General Comments	The Parish Council shares the concerns of many local residents that the proposals for "access to be provided off Tunstead Road with a through connection to Stalham Road" will result in the creation of a road which will be used as a 'rat run' through both the new development and the existing Brook Park development, creating a road safety hazard near the Brook Park children's play area and negatively impacting on the residents of these developments. Furthermore, the provision of highway access on Tunstead Road (an extremely busy road at peak times, which has a proven problem with speeding traffic) will also impact negatively on residents of Tunstead Road and the nearby Two Saints Close, with not even a new roundabout proposed to assist residents trying to exit Two Saints Close or the new development with safely joining the main road. The Parish Council fears these access proposals could lead to road traffic accidents in an area very close to Hoveton's high school. the Parish Council is concerned that Persimmon will most likely be the developer involved in the delivery of the large-scale development proposed for Hoveton in the First Draft Local Plan (Site Reference HV01/B, Land East of Tunstead Road). The Parish Council is therefore concerned that, should this proposal go ahead, the problems encountered with Brook Park 'phase one' (in terms of the work done by Persimmon) may be repeated with Brook Park 'phase two'. The Council believes that difficulties experienced with a developer should be taken into account by the planning authority if that developer applies to take on	Noted: The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion and access arrangements. Any potential developer of a site is not a consideration in land use planning, however mitigation measures will be identified in policy requirements to address and offset any potential adverse impact. The Draft Design Guide also details expected approach to be taken in relation to design.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					another site and the Council seeks assurances from NNDC that this will be done. If this is not possible, then Hoveton Parish Council considers this one further reason why it must object to Site Reference HV01/B.	

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS13)
Objection	0	General comments received from the town council raised concerns around the reliance on one site for the towns allocations and the additional impact growth would have on existing highways and other infrastructure along with the quality of life of existing residents. Specifically access concerns would result in a 'rat run'. Issues around the quality of development on the previous allocation were also raised.
Support	0	
General Comments	2	

Proposals for North Walsham

DS14: Land at Norwich Road & Nursery Drive

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS14	NW01/B	North Walsham Town Council (1218408)	LP730	Object	Development brief should incorporate the following additional points: Point 8 - and demonstration that there is acceptable capacity in utilities provision to include electricity, gas and telecommunication services 9. an overall design framework building on the principles of the District's most up to date Design Guide	Support for the development brief approach welcomed. Consider comments in the development of the development of the policy.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS14)
Objection	1	General comments received from the town council raised concerns around the reliance on one site for the towns allocations and the additional impact growth would have on existing highways and other infrastructure along with the quality of life of existing residents. Specifically access concerns would result in a 'rat run'. Issues around the quality of development on the previous allocation were also raised.
Support	0	
General Comments	0	

DS15: North Walsham Western Extension

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS15	NW62	North Walsham Town Council (1218408)	LP730	Object	<p>North Walsham Town Council wishes to formally confirm its objection to the Draft Local Plan in its current form. We attach our commentary on the North Walsham section of the plan, but our key concerns are;</p> <ul style="list-style-type: none"> • The Industrial Link Road is essential and must be built in advance of the residential developments • The Western Link Road must be built as a single project and be open to public traffic before any housing construction begins • The Town Council has not yet had sight of NCC's ongoing traffic study, nor of traffic forecasts and impacts of the developments, without which accurate comments are impossible • It is unclear how the Declaration of a Climate Change Emergency might impact on the proposals as there is no current policy available. • North Walsham Town Council understands the importance of setting a clear framework for the future development of North Norfolk, and indeed has held very constructive discussions with planning officers over the past two or three years during which it was acknowledged that North Walsham was viewed as a growth town. The Town Council is concerned that under the current proposals that North Walsham runs the risks of becoming a dormitory town for employment in other areas at the expense of employment within the town. It has been understood from the outset that North Walsham would need to expand significantly, and both planning officers and the Town Council agreed that the expansion should be to the west of the town for practical reasons. • However, the Town Council has also from the outset made clear that such expansion must come ONLY with the infrastructure that the town needs in order to meet the current and future requirements of residents, visitors and employers. • A key observation that we wish to make up front is that the draft does not appear to take into account the environmental impact and should adhere to the highest legislation at that time. A statement such as this must by its very nature have a major impact on key policies such as Planning and Future Development, and we believe very strongly that the Local Plan – as a central policy document - needs to be informed by this. North Walsham Town Council wishes to formally confirm its objection to the Draft Local Plan in its current form. • The Industrial Link Road is essential and must be built in advance of the residential developments. The Town Council is concerned that there is no 	<p>Comments noted: The Council is taking the Strategic Urban extension forward through a collaborative approach, recognises the need for a co-ordinated infrastructure delivery including the importance of improving access to the industrial site and has set up a delivery group to manage the delivery and supporting evidence for the delivery of this strategically important growth. Recognition of collaborative working to date and support for the principle of growth and commitment to a development brief is noted and welcomed. The Council has committed to the development of a development brief in partnership and will be subject to further public consultation.</p> <ul style="list-style-type: none"> • The local plan is informed by a sustainability appraisal which reviews the key environmental, social and economic considerations. • Climate Change is recognised as an important consideration to the Council. It is recognised that the challenge for the Local Plan is to take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<p>firm commitment in the current draft to link the A149 Cromer Road via the existing railway bridge to the Folgate Road Industrial area – this was a central part of the earlier discussions between planning officers and the Town Council, and it is difficult to understand why it has been left out at this stage. This link is of fundamental importance to the town, irrespective of any future residential development. The Town Council believes that the road from Cromer Road to this area will need to be in place in advance of any development. This will make the area more attractive to prospective businesses, as full height vehicles can more easily gain access. It is vital that commercial growth precedes the housing such that new residents have opportunities for local employment. The Industrial Link Road would also allow high vehicles to avoid the town centre, which at present they have to use as Aylsham Road provides the only high vehicle route beneath the railway. This is a historic problem, which needs be alleviated and must be added to the plan as a primary objective. The Industrial Link Road would provide significantly more cost-effective solution to access than the very costly and disruptive lowering of the highway beneath Cromer Road bridge and Norwich Road bridges</p> <ul style="list-style-type: none"> • The Western Link Road must be built as a single project and be open to public traffic before any housing construction begins. The Western Link Road is a very welcome feature. The Town Council believes that this needs also be built in advance of development and not piecemeal over the length of the plan. By doing this it will avoid construction traffic having to pass through the town centre and enable HGVs to have access to the industrial link outlined above (par 16.17). If it is to be of value then it must be in use throughout the development stage. The Town Council suggests that this should be of similar construction of the 'Atlantic Avenue' link road between Sprowston and Salhouse Roads in Norwich, built as part of the current residential development i.e. with wide grass verges, cycle/ footpaths and public open spaces • The Town Council has not yet had sight of NCC's ongoing traffic study, nor of traffic forecasts and impacts of the developments, without which accurate comments are impossible • It is unclear how the Declaration of a Climate Change Emergency might impact on the proposals as there is not current policy available. • The Town Council strongly believes that a Working Party should be convened with representation from Town, District and County Councils and 	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<p>the major stakeholders to progress the Local Plan for North Walsham to ensure that it can be made acceptable to our town</p> <ul style="list-style-type: none"> • Whilst the Town Council accept the importance of responding to the government's growth objectives, it is concerned at the implications and effects of a 40% increase in population over the 20-year period, a rate of growth far in excess of any experienced in recent decades. The Town Council believes that this can only take place in tandem with timely and appropriate improvements to the town's infrastructure, such that the quality of life of our residents will be significantly enhanced by appropriate inward investment 	
DS15	NW62	North Walsham Town Council (1218408)	LP730	Object	<p>Continuation.... It is likely that retail chains may seek to serve the new residential development and we would like to see a defined location for a convenience store only, in the western development together with resistance to further large retail units away from existing retail locations to avoid fragmenting town centre retail trading. • It is likely that retail chains may seek to serve the new residential development and we would like to see a defined location for a convenience store only, in the western development together with resistance to further large retail units away from existing retail locations to avoid fragmenting town centre retail trading. • The Town Council notes the need for an additional Primary School and, with improvements to reduce the current traffic problems, and believes that a site for this should be reserved adjacent to Millfield School, allowing two schools on the same campus. Additional access from the outset from an early-built Western Link Road would alleviate current and future access issues and allow for planned development of a joint campus, as it is our understanding that temporary classrooms are being considered at the current school as a short- to medium-term solution to the likely increase in demand for primary school places Early years provision, i.e. covering the 2-4 years old cohort, must also be incorporated into the plan, as this is in short supply in North Walsham</p> <ul style="list-style-type: none"> • The Town Council recognises that Anglian Water's infrastructure will need to be enhanced and reinforced at the developer's cost, and also understands that UKPN's power network and the local infrastructure of other statutory bodies is also likely to need reinforcement if it is to accommodate expansion on the proposed level. The Town Council believes that clear commitments from all utilities that they will support the proposed development should be in place before the plan can be finalised 	<p>Agree: The proposal includes approximately 7 ha of employment provision and suitable small scale retail in line with town centre policies ECN4 and the identified need could come forward. Outside allocations proposals will have to accord with sequential test and national town centre first approach. Consideration for specific allocations for retail will be undertaken through the delivery group. • The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan</p> <ul style="list-style-type: none"> • Support for green infrastructure welcomed- specific proposals and opportunities have been included in background paper no 5 and will be taken forward to inform the development brief. • Support for the development brief approach welcomed. Consider additional

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<ul style="list-style-type: none"> • The Town Council believes that there should be a firm commitment to reserve land for a potential third GP Practice, should this be identified as necessary. Although it recognises the national GP recruitment issues, the Town Council's view is that expansion of the town on the scale proposed will require additional provision to the West of the town. • There are grave concerns about traffic entering the town via Aylsham Road, which is already heavily used, narrow and unsafe for pedestrians. The Town Council suggests that traffic management will be required to ensure that traffic uses Cromer Road instead. • The Town Council proposes a strong green element to the design of public spaces within the new developments, maintaining or creating green corridors using hedges and other features. Green spaces and residential areas should include a high level of tree planting. All new roads should have cycle lanes included and where possible linking into existing cycle routes. Space for cemeteries, allotments and recreation must also be included in the plan. The existing Weavers Way offers an opportunity for an enhanced wildlife and amenity corridor from the town together with a possible Country Park on the west side. We would like local experts to be involved in the design of open green spaces, particularly those for recreational use, as the town has a strong volunteer community with significant practical experience of design and delivery. • The Town Council regrets that excessive, high quality agricultural land is being designated for development. This will remove the ability of food production from future generations, at a time when home production is becoming more important for food security. In the context of the Declaration of a Climate Change Emergency, the Town Council would like assurance that planning officers have rigorously assessed all brownfield sites, particularly the Crane Fruehauf site (which has been empty for in excess of 20 years) and the Bullens site along with lower value agricultural land, before committing to permanently removing higher quality, potentially productive land. Development brief should incorporate the following additional points: <ul style="list-style-type: none"> • After point 5 details addressing the off-site mains water reinforcement and enhancement to the foul sewerage network capacity and demonstration that there is acceptable capacity in utilities provision to include electricity, gas and telecommunication services • New pedestrian links should include links to the railway station, town centre and local schools 	<p>comments in the development of the policy.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<ul style="list-style-type: none"> • water, flooding & drainage management, should reflect the historic and existing problems at the Crane Fruehauf site. • Other sporting facilities in addition to expansion options to North Walsham football club should be considered 	

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS15)
Objection	1	Support for the principle of growth to the west of the town however the Town Council raised objections over the potential for growth without jobs, lack of joined up infrastructure and the requirement to deliver a link road first that connects into the industrial site. The Council also asks that development is brought forward in one phase, that retail element is defined, that the school site is adjacent to Millfield school, and additional land put aside for a new GP surgery. Connectivity and open spaces should feature in any site.
Support	0	
General Comments	0	

DS16: Land at Cornish Way

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS16	E10	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS16)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Proposals for Sheringham

DS17: Land Adjoining Seaview Crescent

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS17	SH04	Sheringham Town Council (1217426)	LP548	Support	STC want top priority given to retaining open and green spaces and for these to be connected as detailed in P. 241-242 S. 17.9-17.10. STC agrees with the three proposed residential sites to be allocated for development and acknowledges the intention to deliver approximately 45 new affordable homes. STC would prefer to see an agreed number of the affordable homes for rent. • STC requires access to Morley Hill from the Community Centre thereby providing a link from the town to Morley Hill. The access will also enable STC to maintain the area within motorized landscaping equipment.	Support noted: The constraints and opportunities have informed the approach to Sheringham. Consider the proposal for direct access to the community centre in the development of this policy

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS17)
Pro objection	0	Support is given for the allocation with the town council requesting improve access to the community centre direct from the site, affordable rented properties and open space provision.
Support	1	
General Comments	0	

DS18: Former Allotments, Weybourne Road, Adjacent to Splash

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS18	SH07	Sheringham Town Council (1217426)	LP548	Support	STC agrees with the three proposed residential sites to be allocated for development and acknowledges the intention to deliver approximately 45 new affordable homes.	Support noted.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS18)
Objection	0	Support is given for the allocation with the town council expressing a preference for rented affordable properties.
Support	1	
General Comments	0	

DS19: Land South of Butts Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS19	SH18/1B	Upper Sheringham Parish Council (1215702)	LP116	General Comments	The proposed site SH18/1B is encroaching into an area of countryside within an AONB. This site is stated as in the Sheringham settlement area however please note it is actually in the Parish of Upper Sheringham.	Agree. The site is in the parish of Upper Sheringham.
DS19	SH18/1B	Sheringham Town Council (1217426)	LP548	Support	STC agrees with the three proposed residential sites to be allocated for development and acknowledges the intention to deliver approximately 45 new affordable homes. STC would prefer to see an agreed number of the affordable homes for rent. STC would seek clarification that site SH18/1 Land South of Butts Lane is in Sheringham rather than Upper Sheringham.	Support noted. The Site is located in Upper Sheringham.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS19)
Objection	0	Support is given for the allocation with the town council expressing a preference for rented affordable properties.
Support	1	
General Comments	1	

Proposals for Stalham

DS20: Land Adjacent Ingham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS20	ST19/A	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS20)
Objection	0	No comments received.
Support	0	
General Comments	0	

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS21	ST23/2	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS21)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Proposals for Wells-next-the-Sea

DS22: Land at Market Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS22	W01/1	Wells Town Council (1212319)	LP098 LP107	Support	The Council wishes to support the development of the Market Lane strip previously identified for an exceptions site development (for local people) and wishes it to be used for that purpose, believing that up to thirty starter homes could be built on the site. In addition, the Council wishes to draw to the attention of the District Council two other sites adjacent to the town boundary, one to the south of Mill Road and the other opposite the Hopkins development to the west of Two Furlong Hill both of lie adjacent to arterial roads.	Support welcomed. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS22)
Objection	0	One comment of support received.
Support	1	
General Comments	0	

DS23: Land Adjacent Holkham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS23	W07/1	Wells Town Council (1212319)	LP098 LP108	Object	The Council wishes to express its concern that the proposed Mill Road development is in a prominent position on the brow of a hill threatens the viability of a small local provider of touring caravan accommodation and equine facilities and does not have good vehicular access. In addition, the Council wishes to draw to the attention of the District Council two other sites adjacent to the town boundary, one to the south of Mill Road and the other opposite the Hopkins development to the west of Two Furlong Hill both of lie adjacent to arterial roads.	Comments noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan.

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS23)
Objection	1	Given the prominent position limited access and existing use.
Support	0	
General Comments	0	

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Proposals for Blakeney

DS24: Land East of Langham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS24	BLA04/A	Cley Parish Council (1217592)	LP656	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Proposed development will be quite visible from higher ground, and abuts a SSSI, so will have quite an impact on the surroundings. Also, the council says the sewage network will need to be upgraded but what about the sewage treatment works which we know are already overloaded at holiday times?	Noted: The Council has liaised with Anglian Water and key service providers to identify capacity issues and inform the development of the Local Plan

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS24)
Objection	0	Cley PC commented that the sewage capacity should be assessed and better provision provided and some thought should be given to appropriate screening of new development.
Support	0	
General Comments	1	

Proposals for Briston

DS25: Land East of Astley Primary School

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS25	BRI01	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS25)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS26: Land West of Astley Primary School

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS26	BRI02	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS26)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Proposals for Ludham

DS27: Land South of School Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS27	LUD01/A	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS27)
Objection	0	No comments received.
Support	0	
General Comments	0	

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DS28: Land at Eastern End of Grange Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS28	LUD06/A	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS28)
Objection	0	No comments received.
Support	0	
General Comments	0	

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Proposals for Mundesley

DS29: Land off Cromer Road & Church Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS29	MUN03/A	Mundesley Parish Council (1218493)	LP794	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We are very appreciative that within the Local Plan, for Mundesley, you have incorporated the need for the retention of green spaces and are being sympathetic towards the construction and finish of any new houses. We also acknowledge the need for more houses to be built. There are only two areas which have not been developed on this length of road (Cromer road), the Memorial Gardens and MUN03/A. Council shares your desire for the village to be as attractive as possible and is concerned about the impact 50 new houses will have if they are all built on the proposed site. We are concerned that further development in this area may impact on the wellbeing of existing people who live in the area as well as tourists. Existing use provided a natural break in and is an elevated position. With the spires of 3 Parish churches visible. It is also the only pedestrian access from the housing in Collingwood Drive to the Village Centre, Library, and Doctors Surgery. Losing the one open green space in this very built up area could have a serious effect on the wellbeing of the parish, as well as having a detrimental effect on our economy, i.e., the many tourists who come to this village for its as yet un-spoilt charm. You wisely recognize the importance of this consideration in your report on page 36 section 5.11-5.15: “Protecting Character 5.11 North Norfolk’s landscape has a significant economic, social and community value, contributing to a sense of identity, well-being, enjoyment and inspiration and being a major contributor to a strong tourism industry.</p> <ul style="list-style-type: none"> • The low-lying coast, the coastal cliff sections and the inland landforms are some of the finest of their kind in the British Isles. The landscape of North Norfolk has been strongly influenced by the sea and is composed of, and enriched by, the combination of distinctive geological and geomorphological features. These features have resulted in valuable characteristics including nationally important wildlife habitats as well as features of cultural significance such as archaeological deposits, field patterns, building materials and settlement forms. The link between people and place is engrained into the landscape of North Norfolk. The proposed development of MUN03/A would obstruct the view of the 	Comments noted. The review of the physical attributes has informed the policy considerations of retaining appropriate open space and connectivity site recognises. The Council has liaised with the Local Highways Authority to identify the likely impacts of new development for the local and strategic road network in terms of highways safety, congestion cumulative growth and access arrangements. The Local Plan seeks to address the strategic needs of the District and is supportive of Local communities bringing forward additional growth to support local identified need through neighbourhood planning.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<p>Parish Church which is visible from most areas of the village. It is the highest point, so any new estate built on MUN03/A will be seen from all aspects. We have included two photographs which show one of the 4 new roll back houses currently being built on MUN03. It is self-explanatory how dominating another 50 houses on this site would be, and this house is not even sited at the highest point. One fact which is controversial is the relevance in planning terms of the loss of view. It is often said "there is no right to a view". Whilst this is correct in strictly legal terms, it does not mean that the loss of a view is necessarily irrelevant to planning. The enjoyment of a view could be an important part of the residential amenity of neighbouring properties, and its loss might therefore have an adverse impact on the residential amenity of neighbouring properties. Loss of a view from a public viewpoint might also have a wide impact on a neighbourhood, and such matters ought to be taken into account.</p> <ul style="list-style-type: none"> • Our next material planning consideration comes under the heading of Highways Issues because Cromer Road and Church Lane carry a considerable amount of traffic, and this development will substantially increase the traffic flow. The access to the proposed site is just past a blind bend. The pavement is narrow in a number of places, causing difficulties for the elderly and people with young children. The whole frontage of MUN03 runs parallel to the section of Cromer Road which is within the coastal erosion zone. • It is understood that MUN03 was considered as a potential site about 8 years ago, and was rejected as being unsuitable for development as stated in North Norfolk District Councils Site Specific Proposals Draft Plan: Final Consultation Statement 2010: "MUN03, Land West of Church Lane Not recommended for allocation: Proximity to erosion zone and development would prevent future re-alignment of the coast road that may be required as a result of coastal erosion. • Should be retained for farming due to climate changes and also to minimise farm vehicle traffic through the village centre • Concern over height of land and that development would dominate the village." We share your aspiration that Mundesley continues to be a successful tourist village, particularly with the new "Deep History" project coming this summer. Council are concerned that building 50 new houses in one location could conflict with this shared aspiration. We 	

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<p>understand from the Draft Local Plan that there is a need to build 50 new houses, but believe building them in smaller clusters around the village, rather than one large development would better fit with our tourism objectives.</p> <ul style="list-style-type: none"> • We do think that a limited development could possibly be permitted on MUN03, e.g., another small cluster of roll back houses built behind the properties currently under construction via the roll back scheme. This means that “open green space” will still exist on the site, but the impact of the building will not have a negative effect on the vista and overall wellbeing of the village. • In order to meet the needs of social housing MPC would like to rectify this imbalance. MPC currently owns the freehold of land at Cromer Road/Tasman Drive (MUN11), 1.6 (Ha) which we consider is ideally suitable for Community-Led Housing. The land could be used for development, making them suitable for rent, and possible purchase, at prices which are affordable. MPC has nearly completed negotiations with NNDC, who are gifting a parcel of land, adjacent to Watson Watts Gardens, which MPC will develop as community allotments, and a new playground, MPC will be funding these facilities so public open space in this area will be greatly enhanced, and strengthened. MPC proposes to instruct an Architect to prepare an initial design scheme and prepare a financial appraisal. Depending on the density, 30 houses might be achievable on this site. Views of the sea will still be achieved by the retention of the field opposite this site. MPC purchased “Woodhurst” 5, High Street, Mundesley, several years ago specifically for community use. This property is in the village centre, this bungalow sits in a large garden, and could be developed into an attractive courtyard of several home. • Through developing affordable housing only on HOU2 and a smaller number on MUN03/A - officers interpretation - We hope that we have demonstrated that the housing requirement can be met, by alternative sites providing high quality and affordable housing, in smaller developments, rather than one large estate 	

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS29)
Objection	0	One town council expressed support for well-designed homes and retention of open spaces but raises concerns over the impacts development of this site would have on the vista, increase in traffic and erosion of a natural break in development.
Support	0	
General Comments	1	

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Proposals for Other Areas

DS30: Tattersett Business Park

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
DS30	E7	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Site Policy DS30)
Objection	0	No comments received.
Support	0	
General Comments	0	

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First Draft Local Plan (Part 1)

Regulation 18 Stage Public Consultation

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

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Appendix C: Comments Submitted by Statutory Consultees & Other Organisations

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Notes

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

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

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

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

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

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

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

First Draft Local Plan (Part 1)

Comments on Proposed Policies

(Submitted by Statutory Consultees & Other Organisations)

Sustainable Development Policies

Policy SD1 - Presumption in Favour of Sustainable Development

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD1	Natural England (1215824)	LP708	General Comments	We advise that the presumption in favour of sustainable development does not negate environmental objectives as specified in section 8a of the NPPF or the assessment of impacts to designated sites and the possible need for mitigation.	Noted
SD1	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP747	General Comments	Development In recognition of the role of Country Estates and the inclusion of a policy supporting Estate Masterplans, the second paragraph should be amended as follows: Planning applications that accord with the policies in this Plan (and, where relevant, with policies in Neighbourhood Plans or Council endorsed Estate Masterplans) will be approved without delay, unless material considerations indicate otherwise	Noted Consider comments in the finalisation of the policy
Page 400	Save Our Streets North Walsham, Mr Berni Marfleet (1217329)	LP337	Object	The Plan does not address key issues and risks, which are vital to safeguard against speculative and environmentally damaging development. We believe the DLP needs to be radically re drafted and for it to be subject to further consultation with the public before proceeding to the next Deposit stage. Whilst the Plan does have objectives and policies for sustainable development and climate change mitigation, it does not address the challenges of assessing the impact, for instance, the carbon footprint of the proposals and what needs to be done to deliver an effective Climate Emergency strategy. The Local Plan is one of the key means to deliver on this recent policy and the Plan does not deal with this directly or fully and comprehensively.	Noted, Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach through the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future in accordance with the 2015 written ministerial

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

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

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

Policy SD2 - Community-Led Development

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

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

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

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

Policy SD3 - Settlement Hierarchy

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD3	Natural England (1215824)	LP710	General Comments	Settlement Hierarchy In accordance with the paragraph171 of NPPF, the Plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA process to justify the site selection and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes.	Agreed: Landscape and settlement considerations including environmental constraints and designations, the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published.
SP3 Page 406	Gladman Developments, Mr Craig Barnes (1217131)	LP274	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The hierarchy comprises four tiers of settlements, with locations beyond these tiers classed as open countryside. At each tier the Local Plan seeks to focus a proportionate amount of growth according to the size of the settlement, role, and sustainability. The settlement hierarchy is supported by a recent appraisal of the services, constraints and needs of each settlement located in the District.. North Walsham, Fakenham, and Cromer sit jointly atop of the settlement hierarchy as Large Growth Towns. The identification of these settlements at the highest level of the settlement hierarchy is considered justified by Gladman given the scale and role of these towns in the District as a whole. Each settlement is generally home to the widest range of services, shops and employment opportunities in the Borough, and benefit from good transport links. The second tier of the settlement hierarchy (Small Growth Towns) is comprised of Holt, Hoveton, Sheringham, Stalham, and Wells-next-the-Sea. Gladman welcome the Council's acknowledgement of the suitability of Holt as a location for new development over the plan period. Holt is home to a range of existing facilities, services and shops and is well connected to nearby settlements by public transport. The inclusion of Holt is supported by Gladman. Notwithstanding the above, it is noted that Holt is identified as a Principal Settlement (along with Cromer, Fakenham and North Walsham) in the Core Strategy. The 'downgrading' of Holt in the hierarchy of the emerging Local Plan is not necessarily objected to as a matter of principle, as long as sufficient housing growth is directed to it in recognition of its extensive range of services and facilities; and, the fact in recognition of the fact that Holt is a significant net importer of employees from surrounding areas (as stated at paragraph 14.3 of the emerging Local Plan). With reference to Holt Gladman support the specific mention made within the policy which recognises Holt as fulfilling an important role for the wider rural area of Central North Norfolk. Development provided in Holt will therefore also help to meet housing needs of the</p>	Noted Consider comments in the finalisation of the policy. Consider the position of Holt within the settlement hierarchy and ensure that there is consistency among all tiers of the hierarchy. Consider the extent to which Policy SD 3 is flexible enough and consider the approach set out within the recently adopted Ashford Local Plan in the preparation of the policy.

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 408				<p>to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e) Conserves and enhances the natural environment and preserves or enhances any heritage assets in the locality; and f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with the local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents; vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with Policy.” Gladman consider Policy HOU5 of the Ashford Local Plan to represent a positively prepared but balanced policy. The policy provides a framework in which decisions can be made about windfall development proposals located beyond the settlement boundary. The policy allows development required to support the vitality and vibrancy of rural areas and enables the delivery of rural housing needs where these are not met by allocations and commitments. The Policy includes the necessary safeguards to prevent unsustainable patterns of development. Its application as part of Policy SD3 will ensure that the spatial strategy of the Local Plan is not undermined. The need for a policy similar that in Ashford LP in the case of North Norfolk is particularly necessary given the significant extent and reliance on windfall development. Its adoption will help boost housing delivery increasing the prospect that the windfall allowance set out in the Local Plan can be achieved and will also assist in providing the necessary uplift in housing land supply required to meet identified housing need.</p>	
	SD3	CPRE (Mr Michael Rayner) (1204056)	LP297	Support	<p>Support with condition : We feel that more clarity should be given to footnote 11 which explains the amount and type of “small-scale development” which could be permitted under this policy, so that it should be amended to read “infill development of between 1-20 dwellings (to be selected in a Part 2 Plan)”. We’re concerned that left as it is that “new allocations” could imply that this type of new development in the named Small Growth Villages could be different from more acceptable “infill development”, and could result in estate-type developments of 20 houses. concerned that draft policy SD3 could lead to estate-type developments in the named Small Growth Villages of up to 20 houses, which would adversely affect these villages' appearance, character and form. Change footnote 11 to: infill development of between 1-20 dwellings (to be selected in a Part 2 Plan).</p>

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

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

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	Savills) (1215901)			<p>effective and consistent with national policy. These representations are made in this context. The District Council has identified Wells-next-the-Sea as a 'Small Growth Town', a second tier settlement within the Settlement Hierarchy. Draft Policy SD 3 directs "...a more limited amount of additional development will be accommodated" when compared to the 'Large Growth Towns' of North Walsham, Fakenham and Cromer. The Council explains its justification for this approach is due to Wells being constrained by environmental considerations. Support is given to the identification of two sites suggested for allocation at Wells to accommodate 80 new dwellings at the town. Notwithstanding the above, it is requested that the Council considers the potential for development at Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. This is the subject of a separate representation made by Savills on behalf of the Estate. Notwithstanding the above support, it is requested that the Council considers the potential for development at Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. This is the subject of a separate representation made by Savills on behalf of the Estate.</p>	<p>housing targets and site approach to Wells •</p>
Page 3 Page 411	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP686	Object	<p>When asked what use any new land for housing should be for, the response to the survey (clarification added - in the wells NP survey) overwhelmingly showed a preference for affordable rented housing for local people. 125 (41%) gave this site their first preference, 89 (30%) second preference and 17 third preference. When asked "do you think there should be some limit on second homes occupancy" 245 (81%) said yes and 49 (16%) said no. When asked "Do you think that tourism should in any way be restricted in and around Wells by controls over development" 235 (78%) said yes and 52 (17%) said no. It has been put to us that these preferences would be met if in SD3 Wells is re-designated as a Large Village instead of a Small Town.</p>	<p>Disagree: The settlement hierarchy is based on an assessment of the facilities, role and function and the functional relationship between places. Wells clearly is and functions as a higher order settlement. Landscape and settlement considerations including environmental constraints, the potential impact of development on landscape and views, the scale of development relative to the settlement size and whether the site preserves the separate identity of a settlement and the importance of natural and built features have been taken into account in setting the housing targets for settlements. Evidence contained within the Housing and Economic Land Availability Study and NNDC Landscape Character Assessment 2019 and background paper 2</p>

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

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

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Page 414				<p>the final list of villages was compiled following a high-level review of rural settlements that focused on matters such as population, the presence of essential services and accessibility to higher tier settlements. This process is described in the report to the Council's Planning Policy and Built Heritage Working Party on 18th October 2018. As acknowledged in the same report the villages on the final shortlist vary widely in terms of settlement size, land availability and accessibility to services. Due to these variations we undertook our own analysis of each settlement on behalf of our client. This comprised a desk top study of all 23 settlements and site visits to the villages we considered to be the most sustainable for new allocations. Whilst this review was primarily intended to allow our client to identify a range of suitable and deliverable sites across the District it has also allowed us to draw very clear conclusions on which villages are best placed to accommodate growth. Ultimately, it has enabled us to present a clear view on the way in which the Council must frame their rural growth strategy and approach the allocation of sites in the LPP2 to ensure the minimum target of 400 homes is achieved. From our review we consider that the following settlements have very limited potential to accommodate additional allocations for the following reasons:</p> <p>Badersfield (Scottow): - lack of market attractiveness is inevitably exacerbated by the presence of the prison (predominantly male sex offenders) half of the village lies within Broadland District, further restricting the ability of the Council to secure growth at Badersfield by way of allocation that will contribute directly towards North Norfolk's housing land supply. East Runton: We are aware that there are currently no sites being actively promoted at the village through the Council's HELAA. The village is significantly constrained by a combination of an extensive conservation area, the Norfolk Coast Area of Outstanding Natural Beauty (AONB) to the south of the railway and the presence of the Coastal Erosion Zone to the north of the A149. In addition, the LPP1 proposes a significant residential allocation (Site C10/1) on the western edge of Cromer, only 500m from the village, that is intended to deliver 90 new homes. All of these factors combined suggest that it is highly unlikely that the village should suitably accommodate anything other than small-scale incremental growth over the plan period and certainly should not be subject of any additional allocations. Horning. Horning received a single allocation of 26 homes in the adopted Site Allocations DPD (2011). This site is subject of a current planning application (reference 11/1505) that has remained undetermined for approaching 8 years. This delay is due to significant constraints at Horning in relation to lack of capacity in the local water treatment system and the heightened sensitivity of the nearby water environment due to the immediate proximity of the village to the Norfolk Broads. The most recent joint position statement signed by the Council, the Environment Agency, the Broads Authority and Anglian Water suggests that this position is under constant review. However, it is clear that the matter is no closer to resolution than it was when first identified as a major constraint in 2013. Indeed, according to the Council's most recent Housing Land Supply statement it is expected that the current</p>	<p>constraints. Further detail is published in background paper 2. The council will review the identification settlements and land supply along with the finalisation of the approach following the consultation and the call for sites in the proposed villages.</p>

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

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Page 496				<p>Villages is the government's increased focus on deliverability described by the NPPF. It is therefore paramount that Policy SD3 allows the LPP2 to identify sites that are principally available, suitable and achievable before all other objectives. This means that the wording of Policy SD3 must build in enough flexibility to allow the Council to respond to all appropriate development opportunities that come forward through the current Call for Sites process. All this means that if an appropriate site is identified at one of the Small Growth Villages that exceeds the 1ha ceiling it should not be discounted purely based on size. Whilst the LPP1 does not provide a cap on the site area of future allocations Policy SD3 does include a seemingly arbitrary cap on the scale of development of 20 dwellings (Footnote 11 of the Plan). It is not clear where this figure has derived from – it certainly does not appear to stem from any requirement set out at paragraph 68 of the NPPF. we recommend the following amendments to Policy SD3 to ensure that it forms the basis of a sound strategy:</p> <ul style="list-style-type: none"> • The deletion of Sculthorpe and Walcott. The amendment of the fifth paragraph to read "Appropriately scaled development, including brownfield developments, community facilities and services will be permitted within (or on the edge of in the instance of allocations to be identified by the Part 2 Plan) the defined boundaries of the following Small Growth Villages"; and • The amendment of Footnote 11 to remove the 20-unit cap and read "Infill development and new appropriately-scaled allocations (to be selected in the Part 2 Plan)". 	
SD3	<p>Norfolk Coast Partnership, Ms Gemma Clark (1217409)</p>	LP479	Support	<p>Settlement hierarchy needs to also assess hierarchy of environmental assets and a robust evidence base of environmental data and accompanying Habitat Regulation Assessments where applicable. We would like to see undesignated areas outside of the AONB considered first, and areas that would not impact on the scenic value of the AONB i.e. large development just beyond the boundary</p>	<p>Consider comments in the finalisation Plan. The Local Plan is supported by an HRA.</p>
SD3	<p>Larkfleet Homes, Miss Charlotte Dew (1217517)</p>	LP679	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Larkfleet support the identification of North Walsham as a Large growth Town. Larkfleet agree that North Walsham has a variety of services, facilities, jobs and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel a long distance. These services and facilities are easily accessible via walking, cycling and public transport.</p>	<p>Support noted.</p>
SD3	<p>Kingsland Engineering Company Ltd (Mrs Nicola Wright, La Ronde Wright) (1209984 & 1217492)</p>	LP638	Support	<p>Kingsland Engineering state that the justification for policy SD3 appears to be sound.</p>	<p>Support noted.</p>

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

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

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Page 4 of 9					<p>services, Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address identified local need.</p> <ul style="list-style-type: none"> The Council have undertaken a proportionate assessment of Plan viability as laid out in the NPPG in order to appraise the impacts of the emerging policies on the economic viability of the development expected to be delivered through the Local plan. The study recommended not to introduce a CIL charge in the current economic circumstances . The study is published as part of the evidence base and concludes there is little potential to accommodate additional charges such as CIL.
	Raynham Estate (Mr Nick Moys, Brown & Co) (1215832 & 1215834)	LP133	Object	<p>The introduction of some flexibility in draft Policy SD3 to allow development in smaller villages is welcomed. It is considered that, in principle, this approach accords with national planning guidance on rural housing. However, it is considered that the conditions under which development may be permitted under Policy SD3 are unduly and unnecessarily restrictive. In particular, it is considered that by limiting development to previously development land (PDL), the draft policy would unacceptably limit or rule out development in many rural settlements due to the lack or absence of brownfield sites. For instance, in the villages of East Raynham, West Raynham and Helhoughton, the only 'previously developed' sites potentially available comprise residential gardens in built up areas or are occupied by agricultural buildings. However, these sites fall outside the NPPF definition of PDL and so would not qualify for consideration under Policy SD3. In South Raynham, the only potentially available PDL sites are occupied by existing businesses, the redevelopment of which would result in an undesirable loss of employment and/or community facilities.</p>	<p>Noted: Consider clarification in future iteration of the Plan. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as</p>

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

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

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				<p>Conserves and enhances the natural environment and preserves or enhances any heritage assets in the locality; and f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements: i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with the local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents; vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with Policy.” This approach allows the Council to take a more flexible approach that is proportionate to the size and nature of the settlement without compromising the integrity of the Council’s spatial strategy and settlement hierarchy. Such an approach will better support the Council in meeting its ambitious targets for windfall development and provide flexibility in delivering both market and affordable homes that will improve the vibrancy and vitality of North Norfolk’s rural communities. Recommendation The SD3 is rewritten to provide greater flexibility to support development within and on the edge of settlements in rural communities.</p>	<p>in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback evidence of need and the potential impacts on affordable housing provision.</p>
<p>Page 422 SD3</p>	<p>Firs Farm Partnership (Ms Becky Rejzek, Lanpro) (1218497 1218496)</p>	<p>LP805</p>	<p>General Comments</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supporting Policy SD3 The identification of Sutton as a ‘Small Growth Village’ capable of accommodating some housing growth within Policy SD3 of the draft Local Plan is supported. Sutton has a good range of local facilities including an infant school, two Churches, village hall, boating marina and daily bus services between Sutton and Norwich, Great Yarmouth, Wroxham, Gorleston, North Walsham and Stalham. Services run regularly throughout the day. These facilities have been identified within Background Paper 2 – Distribution of Growth, which concludes that Sutton meets the criteria of a ‘Small Growth Village’. In addition, Sutton is located within 1.8 miles of a range of services and facilities within Stalham, which is identified as a ‘Small Growth Town’ within the proposed settlement hierarchy.</p> <p>Whilst it is considered both logical and sustainable to focus growth within the larger settlements that are capable at present of sustaining additional population, the ability to improve upon the sustainability of a settlement by delivering community benefits and new homes, is not given appropriate recognition within Draft Policy SD3. Paragraph 78 of the National Planning Policy Framework is clear in that: “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.” In this respect, the prescription of no more than 20 dwellings to all identified smaller villages within the Draft Plan is considered overly restrictive. As</p>	<p>Noted. Consider comments in the development the policy approach. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural</p>

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

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Page 424				<p>into account the alternatives, and options such as building a large new settlement somewhere in the District; Rural Dispersal; and multiple settlement expansion etc., which are less well performing in sustainability terms than the proposed hierarchy. The Council may, however, wish to consider whether more growth should be directed to Cromer given the extensive employment opportunities in the town (including the headquarters of North Norfolk District Council, which is a significant employer) and the number of people on the Council's housing waiting list who have expressed a preference for living in Cromer. At 1,479 the number of people on the housing waiting list expressing a desire to live in Cromer is higher than the other two large growth towns (Fakenham, 1,125 and North Walsham, 1,432). However, with the proposed allocations identified in the First Draft Local Plan it will receive fewer new allocations than Fakenham (680) and considerably fewer than North Walsham (2,150). We note that one of Cromer's known infrastructure constraints is limited school capacity and their locations in relation to catchments; and can confirm that Pigeon's site interests at Cromer (site ref: C10/1: Policy DS 3 is able to accommodate a new 2 Form Entry primary school, and land will be reserved for this provision. In order to meet this requirement a 2.2ha site is identified for a 2 Form Entry primary school (with sufficient land for a pre-school should this be required) with a further 0.4 ha of land for further expansion, in order to future proof education in the town. We note that whilst school capacity has contributed to a 'throttle' on housing numbers in Cromer (Background Paper 2: Distribution of Growth: Cromer conclusion (page 18)), that the new school capacity to be provided on site C10/1 will address this issue.</p>		
	SD3	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP574	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is a clear and justified need to explore the best approach to meet the housing and economic growth needs of the District, particularly given the current acute housing shortage nationwide and the need to maintain economic stability in conjunction with that. The approach to distributing development in accordance within the proposed settlement hierarchy is supported. With regard to Fakenham specifically, the proposed policy appropriately maintains the town's status as a primary location for growth in the District (being identified in the current Core Strategy as a Principal Settlement) and recognises its role as a retail and service centre for the wider area. This will secure its ongoing potential to deliver additional residential and commercial development.</p>	Support noted.
	SD3	Glavenhill Ltd (Hannah Smith, Lanpro) (1218811)	LP736	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: These representations are submitted on behalf of the land promotor, Glavenhill Limited who is submitting the site (land adjacent to the former RAF Coltishall and the village of Badersfield) for its mixed-use, residential-led allocation on behalf of the landowner, Mr Simon Shaw. A Call for Sites (Small Growth Village) has been submitted along with a Sustainable Urban Extension Vision and Delivery Document. Whilst the North Norfolk site is modest in size, it forms part of a wider proposed allocation area which 'straddles' the two Districts of Broadland and North Norfolk and as set out below and within the</p>	Noted. Consider comments in the development the policy approach. The distribution of growth is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic

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

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Page 426				<p>development offer in its own right. The site is located adjacent to the village of Badersfield which is identified as suitable and capable of accommodating small scale (in the order of 20 dwellings) new residential development, based upon its current local service provision. The settlement is recognised at page 92 of the Council's Background Paper 2, Distribution of Growth that has been published alongside the draft Local Plan to provide a "valuable functional role within the District". The Council conclude that "for Badersfield it is considered that the constraints would not limit the principle of development within the settlement". The provision of housing would in the Council's view help address housing need, enhance the vitality of the community and support the retention and viability of local services. The proposed North Norfolk allocation site is well related to the existing village and is bound on two sides by built form and to the west by woodland and the north by a major road link that clearly and defensively delineates the proposed allocation site. The North Norfolk site can be seen from the enclosed documentation to be a well contained, defensible and sustainable small-scale extension to the existing settlement that is capable of being supported by the Council's existing Spatial Strategy when considered individually and / or as part of the wider (Broadland) proposed allocation area.</p> <p>Draft Policy SD3</p> <p>Whilst it is considered both logical and sustainable to focus growth within the larger settlements that are capable at present of sustaining additional population, the ability to improve upon the sustainability of a settlement by delivering a mix of uses, including a meaningful element of housing and assisting to address settlement specific needs, including affordable housing, is not, in Glavenhill's view, given appropriate recognition within Draft Policy SD3. Quotes paragraph 78. In this respect, the prescription of no more than 20 dwellings to all identified smaller villages within the Draft Plan is considered overly restrictive. As worded, the Policy lacks the necessary flexibility to allow development proposals to respond positively to the specific characteristics and needs of different settlements. Whilst Badersfield is considered by the Council to lack the necessary services to be 'designated' a larger village within the Settlement Hierarchy, it is capable and in need, due to the presence of a successful Enterprise Park that lacks a large residential / working population nearby, and the need to provide additional new affordable homes, of accommodating additional residential and local service provision beyond that facilitated through draft Policy SD3. Contrary to paragraph 35 of the NPPF, the Draft Plan's restriction on growth within the smaller villages is considered to be neither 'justified', 'positively prepared' nor 'effective' in responding to the needs of individual populations. For the reasons set out above, and in order to make the Draft Plan 'sound', Glavenhill request that the rather arbitrary and unjustified restriction of between 0 – 20 dwellings for small villages be deleted from the policy and that this restriction be replaced by a criteria based approach to assessing settlement suitability and requirements to accommodate additional growth. That said, the enclosed</p>	

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

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

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

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

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

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

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

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				<p>(PF/17/1802). These developments will change the context of our site – in landscape and other sustainability terms, not least the setting of the heritage assets – and ought to be given proper consideration and amended Sustainability Appraisal scoring accordingly. The Indicative Masterplan accompanying this representation illustrates how the site can be developed for approximately 150 dwellings (possibly including a care home) and public open space in a way so as to address the particular ‘negative’ scoring relating to landscape and heritage assets. It also illustrates how development of the site would be undertaken in relation to existing and approved development – notably the FW Properties developments south of Horning Road (25 houses) and extension to Stalham Road Industrial estate (employment) (see above). In addition, it shows how the landscape, heritage and ecological resources can be protected/enhanced through design and proposed extensive landscaping and new woodland planting, as well as more formal public open space.</p>	
SD3 Page 434	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership (1217091 1217088)	LP291 LP293	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: White Lodge (Norwich) Limited are the sole owner of ‘the Former Nursery site’ identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical nor desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue. Request that land identified at the Former Four Seasons Nursery is allocated as a small</p>	Support noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 435				<p>site for up to 20 units within the Local Plan. The site is available for development now, and prior to adoption of the plan, and its suitability and deliverability have been recognised in HELAA. Transport statement provided in May 2016, demonstrated that traffic generated by development of the site for housing purposes would result in an overall decrease in vehicle movements, both accesses appropriate and are capable of being provided. Indicative layout provided, site capable of providing 16 dwellings. Final numbers will be influenced by the chosen mix, scale and layout of development proposed at a later stage and could increase or decrease in response to these detailed considerations. Retain area of land immediately east of Woodland Lodge to ensure separation likely to become garden area. Sufficient separation between dwellings can be achieved. No heritage assets in vicinity. Trees subject to TPO and substantial area of woodland designated as County Wildlife Site on opposite side of Selbrigg Rd. Trees on northern and southern boundaries would be retained and trees planted. Site within Flood Risk 1, surface water could be directed away from proposed dwellings. The Former Nursery site proposes development of previously occupied land, which is located between existing residential dwellings, and is not subject to significant environmental constraints. This site should therefore be considered for allocation to provide much needed housing within the Small Growth Village of High Kelling. An additional site (HKG01/1) was proposed in Call for Sites 2016. Due to its location within the AONB boundary, site reference H0088 (and any others north of the Cromer Road) would not be preferable for allocation in comparison to other identified suitable, available and deliverable sites which lie outside the AONB boundary, such as the Former Nursery site as proposed.</p>	

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

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

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

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

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

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

DRAFT

Policy SD5 - Developer Contributions & Viability

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				it is unclear whether the requirements of the Local Plan are viable. Specifically, Gladman has concerns with the approach of the viability assessment in testing the following policies of the Local Plan: • Specialist elderly care as required through Policy HOU2; • The lack of assessment made for Policy HOU8 for 5% M4(3); • Sustainable build costs imposed through Policy HOU11; • The lack of assessment made of Policy SD16 for electric vehicle charging.	economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5% contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.
SD5 Page 442	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP750	General Comments	To make the policy clearer and consistent with national policy and the CIL regulations, part 3 of the policy should be amended as follows: 3. Developer contributions will be required to secure infrastructure, where this meets the tests set out at part 1 of this policy, which are necessary to ensure: The first bullet point should be amended or omitted as it is unclear what is expected; Second bullet point should be amended to a policy compliant level of affordable housing (subject to viability) As a generality the bullet points below part 3 of the policy are unduly open-ended and do not provide the requisite degree of precision or detail on what level of developer contribution will be required. Nor do they direct the reader to where that requisite detail can be found	Disagree. Its not possible or appropriate to pre-empt the circumstances of an individual proposal and the list as indicated is indicative of the required considerations but not exhaustive and line with PPG Paragraph: 035 Reference ID: 23b-035-20190901 Revision date: 01 09 2019. which details what can be considered as infrastructure for the purposes of developer obligations. Detailed pre application advice should be sought in line with national policy to inform any submission of proposals. The bullet clearly links to the required site specific allocation policy. Affordable housing thresholds are set as minimums in Policy HOU2 - The council will seek the highest level of affordable housing.
SD5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP485	Support	We support the delivery of environmental infrastructure and the need to reference the mitigation and monitoring strategy.	Support welcomed
SD5	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP680	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Larkfleet supports Policy SD5, but recommends that Section 2 ' Viability' of the Policy is amended to enable the submission of a viability appraisal at a later date within the application process. The concern is that the full extent of developer contributions is only identified at the post submission of a planning	Noted, disagree. As set out in para. 7 .47 of the emerging LP and in line with expectations from national policy the LPA expects that the viability methodology, details and standard inputs of any viability

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

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>related in scale and kind to the development'. Pigeon also notes that the NPPF (section 34) requires that Plans should set out the expected 'levels' as well as the 'type' of contribution. As written, the Policy does not include the 'levels' of contributions expected. Whilst the levels of affordable housing are set out in Policy HOU 2, there is little further information about the levels of contributions that may be expected for other types of contribution. We suggest that the Council may wish to consider providing more information about the levels of contributions that will be expected, either within the Local Plan itself or within an updated Infrastructure Delivery Plan.</p>	
SD5	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The 2012 NPPF recognised the need for the viability testing of the policies in a local plan to ensure the cumulative impact of the policies in such plans did not impact on the deliverability of development. Whilst paragraph 34 of the 2019 NPPF maintains this position paragraph 57 sets out that when considering viability of an application decision makers can assume that development that accords with local plan policies are viable. This paragraph places far greater emphasis on the need for viability to be considered as part of the preparation and examination of the local plan compared to the previous framework where there was more acceptance that policies could be negotiated at the application stage. The Government goes on to confirm this approach stating in paragraph 10-002 of PPG that: "The role for viability assessment is primarily at the plan making stage" Fundamentally the Government want far fewer applications to require negotiation with regard to affordable housing and other S106 contributions in order to speed up delivery and ensure that what is written in local plans is delivered. It is therefore vital that the Council considers viability very carefully and makes certain that the cumulative impact of the policies in the plan will not make development unviable. It will also be important that policies then reflect this evidence given that the Government expectation is that negotiation will be the exception rather than the rule. After examining the Council's Interim Viability Assessment, we do have some concerns that the Council has not adequately tested the cumulative impact of the policies in the plan on viability as well as underestimating some of the financial inputs into the model. These concerns include: • Developer profit. The Council have applied a profit margin of 17.5% and whilst we recognise that government guidance suggests a range of between 15% and 20% can be considered applicable many of our members will need to show a minimum of 20% profit margin in order to obtain finance. The Council must provide evidence as to why a lower profit margin is considered appropriate in North Norfolk; • Specialist elderly care. have not been considered within the relevant residential scenarios outlined in paragraph 4.14 ; • Sustainable construction</p>	<p>Noted: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging polices on the economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5% contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>costs through HOU11; • The lack of assessment made of Policy SD16 for electric vehicle charging; • The lack of assessment made for costs for Mitigation for designated habitats and biodiversity net gains; • The lack of assessment made for Self-build and custom housebuilding; • The lack of assessment for Policy HOU8 for 5% M4(3). • Open space standards, does not state whether these reflect the Council's expectations that would result from the implementation of ENV7 of the draft Local Plan. A higher level of provision than tested in the viability assessment would reduce the net developable area; decreasing the number of units that are able to be provided which would impact on development viability. Recommendation Given that viability assessments are sensitive to changes in any inputs the Council will need to revisit their viability evidence following this consultation to take account of all the costs being imposed, as required by paragraph 34 of the NPPF. We would also suggest that further work will need to be undertaken to engage with the development industry on the evidence set out in this local plan. Paragraph 10-002 of PPG outlines the importance of engaging with developers with regard to viability and evidence will need to be provided as how this has been undertaken.</p>	
Page 55 446	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP313	Object	<p>Issues and concerns were raised at the Council-run Viability Workshop (29 August 2018) about the basis and assumption by NCS (authors of the Plan Wide Viability Assessment, July 2018). Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of it, including the 35% affordable housing level proposed by the draft Plan in Affordable Housing Zone 2. This particular so as the Draft Plan notes that: "Applications that accord with the site specific policies and this Local Plan will be assumed to be viable and the full policy requirements sought." (paragraph 7.42; and "The approach is intended to provide added certainty around viability and delivery, by setting clear affordable housing and other infrastructure requirements so that they can be accurately accounted for in the price paid for land. For the avoidance of doubt, it is the Council's intention to set affordable housing requirements at the highest viable level in order to increase the delivery of affordable homes across the District." (paragraph 7.43) To what extent, therefore, can the viability of all proposed allocated sites be relied upon, particularly those larger allocations (North Walsham and Fakenham) relying upon significant supporting infrastructure? (We have - elsewhere through this consultation exercise – indicated that there should be a better distribution of proposed housing allocations, particularly within the Large Growth Towns and Small Growth Towns categories of the Settlement Hierarchy, including an additional allocation in Hoveton). Paragraph 7.43 notes</p>	<p>The council have undertaken a proportionate assessment of plan viability as laid out in the PPG and as is the nature of plan development further iterations of the study are expected to inform the finalisation of policies including where necessary detailed site specific appraisals. The council took on board comments made at the viability stakeholder event, a revised study informed the emerging policies and was republished alongside the draft plan consultation documents. Detailed feedback including the revised costings are included in the Interim consultation statement Appendix L. and the study is available in the Councils web site. Following the event, the study appraisals were subsequently re run with updated assumptions in relation to the suggestion of increased build costs along with a review of other inputs. The revised costs are based on independent data provided through BCIS as advised in the</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>that: "The intention is that this [Assessment of Plan Viability] is kept up to date to inform plan making at each stage of the plan preparation process and the subsequent delivery of growth." How will this be kept up to date, through what process and how will this be scrutinised/consulted upon/examined? We have concerns about the apparently open-ended form of expected developer contributions in paragraph 3 of the Draft Policy, especially given the footnote that "this list is not exhaustive". In the absence of a Regulation 123 List for the provision of infrastructure through CIL monies under the Community Infrastructure Levy Regulations 2010, we are concerned that there is insufficient clarity about the types, extents and expected contributions. References are made in the draft policy and supporting text to "healthcare" and "health provision". It is noticeable that NHS England has – latterly – started to request financial contributions through planning application, to address primary healthcare impacts arising from a proposed development. However, it is our view that financial contributions to doctor and dental surgeries (private businesses) is not a planning matter, and does not meet the tests under Regulation 122 of the Community Infrastructure Levy Regulations 2010. For doctor and dental practices, it is anticipated that the market will respond to the increased demands arising from proposed development. Consequently, broad policies that seek such (expressly or implicitly) should be avoided. We also seek clarification for the basis on which a requirement of a Health Impact Assessment to support applications for 50 dwellings or more (hitherto the threshold is 500 dwellings) is set out in draft policy SD5. Updated national Planning Practice Guidance on viability was published on 09 May 2019. Policy SD5 and supporting text will need to be reviewed to ensure that it is up-to-date in that context.</p>	<p>updated Planning Practice Guidance plus a percentage allowance for additional external costs. A further £10 sqm is added for category 2 Accessible and adaptable housing. Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of the policy requirements in the emerging allocations. A 17.5% developers profit is used, reflecting the reduced risk of building in North Norfolk as agreed at the meeting. The revised study also reflects the areas of higher value areas outside the main indicative zones. The affordable housing mix was reviewed to ensure it remains NPPF (July 2018) compliant and reflect the more realistic requirements of North Norfolk. The larger strategic typologies include a requirement for flats which are now based on the lower national space standard of 50 sq m for a 1 bed rather than a 2 bed. Sales values, fees, finance etc. were not at this stage reviewed, given the iterative nature of plan making further work in refining values as well as costs will be undertaken at a stage to inform policy development. The study clearly identifies different affordable housing zones. The Council has signed up to the Joint Norfolk health protocol and developments should be informed by the healthy planning checklist contained in the protocol when preparing development proposals. The PPG identifies Health as a component of infrastructure for the purposes of developer obligations Paragraph: 035 Reference ID: 23b-035-20190901 Revision date: 01 09 2019</p>
SD5	Trinity College Cambridge (Ms)	LP578	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is critical that infrastructure is delivered in a timely manner to support and service	Noted. Consider comments in the development of the policy.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	Kirstie Clifton, Define Planning & Design) (1210089 1210087)			proposed development, and on this basis a phased approach to its delivery is supported. Whilst clarity on the viability assumptions proposed in relation to development is important to the timely determination of planning applications, Trinity College question the reliability of submitting a comprehensive viability appraisal in support of an outline planning application (for strategic development in particular) at validation, given the potential uncertainty at that stage on the associated infrastructure costs.	

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

Policy SD6 - Provision & Retention of Local Facilities and Services

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

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

Policy SD7 - Renewable Energy

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response	
Page 451				<p>opinion on renewable energy is such that it is difficult to define significant changes in a view as having a definitely beneficial or definitely adverse effect on visual amenity for all members of the public who may experience that view. It is widely accepted that it would be impossible to locate a renewable energy development without some significant effects on landscape character and/or visual amenity. Applications for renewable energy developments that are accompanied by an LVIA will define a threshold of significance, and this would never be zero. However significant effects are not necessarily adverse, and adverse effects are not necessarily unacceptable. However significant effects are not necessarily adverse, and adverse effects are not necessarily unacceptable. The renewable energy policy should reflect the Councils declaration to become a zero carbon District and the Council's declared 'Climate Emergency'. As such terminology within the Policy needs to be more carefully worded in particular 'no significant adverse effects'. Without this amendment the policy is unreasonable and restrictive. The policy reiterates footnote 49 of the NPPF, as this is already stated within the NPPF it does not need to be repeated. If the Council choose to quote this footnote, then it should also define what it means by 'affected local community' and how it will establish that a proposal has the 'backing' of the local community. To reflect the NPPF it should also ensure that the policy does not restrict the repowering of existing wind energy sites. Insert the word 'unacceptable' prior to significant adverse effects in both cases where it is raised in the Policy. Delete the phrase 'All planning applications for wind turbines should demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal should have their backing. SD7 does not reflect the repowering of existing wind turbines in line with the NPPF. It is suggested that this line is removed</p>	Character assessment and landscape sensitivity Study.	
	SD7	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP486	Support	We support the delivery of environmental infrastructure and the need to reference the mitigation and monitoring strategy.	Support welcomed
	SD7	Historic England (1215813)	LP705	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Welcome the reference to heritage assets and their settings	Support noted
	SD7	Norfolk Wildlife Trust (1217447)	LP691	Support	Recognising the impacts of climate change on wildlife, we are concerned that the renewable energy policy does not provide sufficient support for renewable energy provision. In the Vision, it states that 'the challenge for the Local Plan is to devise ways to ensure that the carbon footprint of existing and new development is reduced'. However, whilst the policy text starts with support for	Noted- consider amendments to the renewable energy policy to include targets for energy efficiency improvements and renewable energy provision aligned with national targets set by the government and

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 452				<p>renewable energy proposals, the majority of the policy (and the supporting text) appears to focus on the range of circumstances where wind energy would not be permitted. This does not appear to be a progressive policy which would encourage the uptake of renewable energy provision in the district over the plan period, and misses opportunities to support community scale renewable energy provision such as solar panels on new buildings. The government carbon reduction targets set out in the 2008 Climate Change Act committed the UK to an 80% reduction by 2050, Recent government targets have committed the country to net zero carbon by 2050, with five-yearly carbon budgets to 2032, by when a target reduction below 1990 levels of 57% is set. Subsequent to the publication of the draft plan, the government has now committed to a net zero carbon target by 2050. In order to contribute to national targets, we recommend that the plan sets targets for energy efficiency and renewable energy generation (e.g. the Merton rule) in order to provide clear support for these measures in the plan. Positive examples of existing and draft policies that could be used as models can be found in the 'Rising to the Climate Crisis – A guide for local authorities on planning for climate change' report produced in 2018 by the Town & Country Planning Association and the Royal Town Planning Institute. For example, draft policy GM-S 2 of the Greater Manchester Spatial Framework Revised Draft 2019 sets an aim of delivering a carbon neutral plan area by no later than 2038, supported by measures including the promotion of retrofitting existing buildings to improve energy efficiency and generate renewable or low carbon energy, increasing carbon sequestration through restoration of habitats and tree-planting and seeking carbon reductions in new dwellings. We are concerned that the renewable energy policy does not match the aspirations in the Vision and Aims & Objectives, and will not result in any significant reductions in the carbon footprint of existing or new development. Suggested Change: We recommend that the renewable energy policy is revised to include targets for energy efficiency improvements and renewable energy provision, aligned with national targets set by the government, and in line with best practice established by other local authorities, and to include support and highlight opportunities for other forms of renewable energy compatible with new development, such as solar panels on new build roofs. This would allow the Council to demonstrate that the plan will result in a reduction in carbon emissions and an increase in the renewable energy provision in the District.</p>	<p>in line with the best practice to include support and highlight opportunities for other forms of renewable energy compatible with new development such as solar panels on new build roofs. Consider the extent to which these are covered within the North Norfolk Design Guide and/or consider the need to refer to this guide within the policy itself.</p>

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

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Policy SD8 - Fibre to the Premises (FTTP)

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				is needed on what constitutes "special circumstances" as referenced in the third paragraph.	

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

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Policy SD9 - Telecommunications Infrastructure

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

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

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

Policy SD10 - Flood Risk & Surface Water Drainage

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD10	Anglian Water (1217129)	LP352	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We welcome the reference made to developers having to follow the surface water hierarchy. Anglian Water considers that specific reference to sewer flooding should be included in Policy SD10 as well as number of specific changes in respect of surface water management. It would be helpful it is made clear that discharge to SuDS is the preferred method of surface water disposal and that discharge to the public sewerage network would be considered as a last resort only ensuring that there is no detriment from the additional surface water flows. With applicants having to demonstrated they have followed the surface water hierarchy as outlined in Part H of Building Regulations and the NPPG. This is made clear in Footnote 21 of the First Draft Local Plan and should be included in the wording of the policy. We would also recommend that Policy 22 includes reference to foul sewerage systems and the potential risk of flooding from all sources including sewer flooding. The final paragraph of the policy appears to relate to the requirement to demonstrate that the sustainability benefits to the community outweigh flood risk which forms part of the exception test. This would only apply where it is not possible to locate a development in flood zones with a lower risk of flooding. Recommended addition include after point 2 add new text: incorporates Sustainable Drainage Systems (SuDS) unless it can be demonstrated that it is not feasible;]. .add after 5 [6. That adequate foul water treatment and disposal already exists or can be provided in time to serve the development;] [new text] [7. That no surface water connections are made to the foul system;] [new text] [8. That suitable access is safeguarded for the maintenance of water supply and drainage infrastructure; [new text]. penultimate paragraph Evidence of how the hierarchy [could be achieved] [delete text]]has been followed [new text] is required and where a drainage option is not feasible evidence of all alternatives considered should be submitted could be achieved is required and where a drainage option is not feasible[new text] [cannot be provided],[deleted text] evidence of [an] [deleted text] all [new text]alternatives [plan] [text deleted] considered [new text] should be submitted. Where there is no alternative option but to discharge surface water into [a surface water] [new wording] or combined sewer, developers will need to engage with the [appropriate bodies] [delete text] Anglian Water and the LLFA [new text] and demonstrate why there is no alternative. Clear evidence depicting the above and that the discharge of surface water will be limited to attenuation rate, including climate change allowance, will need to be submitted.;' Delete last para and update footnote 21 to include . Including but not limited to Lead Local Flood Authority (LLFA) guidance 2017 and updates,</p>	Noted: Consider feedback in the development of the policy

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 460				<p>treatment before discharge such as oil separators from large car parks. We recommend that, as well as LLFA guidance, developers must consider the EA's requirements (copied in the advice to applicant section below) for SuDS schemes to ensure that groundwater is protected. The paragraph would also be further enhanced by referencing the need to separate disposal routes for foul and clean surface water which will also help alleviate the risks of surface and foul water flooding. For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2018), in particular Position Statements G1 and G9 – G13 available at: https://www.gov.uk/government/publications/groundwater-protection-position-statements Paragraph 7.76 We are in support of the statement that states 'SuDS should form an integral part of the green infrastructure framework of a site, and provide wider amenity, recreational and biodiversity benefits where appropriate'. SuDS, wetlands and water features can bring huge benefits to biodiversity provided they are appropriately managed. They are also invaluable in protecting local waterbodies from increased rates of runoff and associated pollution which can result from housing development. Given that many of North Norfolk's waterbodies are UK BAP priority chalk streams habitat, it is critically important to ensure that there is no net deterioration in water quality as a result of development. This section would be improved by making reference to permeable hard surfaces to increase infiltration and provide rainwater systems and water butts to capture and reduce water use as well as run off. Paragraph 7.77 This paragraph would be enhanced by stating that the degree to which any solution may be considered appropriate will depend on its impacts on water quality. In some cases, infiltration drainage will not be appropriate on a site – for example, where ground is affected by contamination.. Paragraph 7.79 With regards to reference 21 and the statement which says "The LLFA also consider that deep infiltration (infiltration greater than 2m below ground) is similar to discharging to a surface water sewer". Surface water drainage using deep drainage, including deep bore soakaways is our least preferred method of drainage and should only be considered as a last resort when all other methods have been considered. This is because deep drainage systems bypass the soil zone and increases the potential for pollution of groundwater to occur. We recommend that the local plan refers to our groundwater position statements G1, G9-G13 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/692989/Environment-Agency-approach-to-groundwater-protection.pdf.</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD10	Environment Agency (1217223)	LP454	Support	We recommend that the first bullet point is amended to read "all development will be located to minimise the risk of flooding, mitigating any such risk through avoidance, design of mitigation and include sustainable drainage (SuDS) principles, where appropriate". In situations where the council consider sustainability benefits outweigh flood risk, development will still need to be resilient to flood risk and aim to achieve as many flood risk reductions measures as possible. We welcome the comments confirming that a drainage strategy should be provided at the pre-application and outline stage details. Although we no longer comment on surface water strategies, we realise the benefit of this statement.	Noted: Consider comments in the development the policy.
SD10	Natural England (1215824)	LP713	General Comments	We agree that SuDS can provide wildlife benefit if appropriately designed and recommend that the key requirements of local wildlife are identified and incorporated. We recommend that Policy SD 10 includes a requirement for proposals to demonstrate that the method of surface water disposal will not have any adverse effect on European and nationally designated sites where appropriate.	Noted: Consider comments in the development of the policy
SD10	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP739	Support	The County Council welcomes Policy SD 10 which deals with Flood Risk and Surface Water Drainage	Support noted
SD10	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	Please see below the suggested text for Brownfield development: Brownfield sites should aim to reduce runoff as close to greenfield rates as possible. The discharge rate for brownfield sites should be no more than the rate prior to any new development. Applicants are encouraged to seek betterment in surface water runoff as part of their proposals for brownfield sites. The runoff rate should be agreed with the Local Planning Authority, in conjunction with the Lead Local Flood Authority and where relevant sewerage undertaker. Anglian Water Surface Water Drainage Policy (Nov 2017) for discharging to sewer also states 'Where a Brownfield site is redeveloped no historic right to connection will exist and any sewer connection be treated as new. The site will be treated as if it was greenfield and therefore the discharge rate limited to the equivalent to the 1 in 1 year greenfield rate'.	Noted:-Additional commentary updating commentary on this policy (p739) from LLFA 16.10.19. Consider comments in the finalisation of the policy
SD10	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning)	LP746,LP753	General Comments	The policy imposes a requirement to provide details of a drainage strategy at the pre-application stage. This should be omitted. It is both inappropriate and unduly onerous for inclusion in a Local Plan for use to guide decision making. The final paragraph of the policy should be amended to be explicit that the requirements relate to sites at risk from flooding (Zone 3) recognising that	Comments noted: The Council has fully engaged with key service providers in the development of this policy including the lead Local Flood Authority and Environment

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

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

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

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Policy SD11 - Coastal Erosion

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 466				<p>Zone); in a managed and phased way. For many businesses along the North Norfolk Coast, a staged/phased 'roll back' of development within the Coastal Change Management Area will be more feasible, viable and deliverable, than a complete move outside of the Area, particularly given some of the Plan's other restrictive policies, including Policies for new/relocated/replacement tourist accommodation; and policies that seek to protect the character and appearance of the North Norfolk AONB and Countryside. As currently drafted, the Plan will make it incredibly difficult to find suitable alternative and viable sites outside of the Coastal Change Management Area and close by the coast, where visitors want to stay. Much of the area close to the coast and outside of the Coastal Change Management Area is AONB and designated Countryside. The Plan has restrictive policies that seek to protect the character and appearance of the AONB. Recent experience would suggest that opportunities for the relocation of tourist accommodation from vulnerable areas, to other less vulnerable coastal locations are few and far between, with very little take up and even where sites have been found they have not always been supported. It is going to be virtually impossible for tourist accommodation operators to find suitable and affordable potential sites within or adjacent to settlements close to the coast. Such sites often have a 'hope value' or are already optioned for residential development. A relocated caravan and camping site cannot compete with the expected land values that residential development would generate, particularly given the considerable costs of relocation. The Plan needs to acknowledge the special circumstances that affect the relocation of tourist business and be more understanding and supportive, if it is to deliver the 'roll back' policy. Also, Blue Sky Leisure is concerned that for relocation/replacement proposals to be acceptable they need to be supported by a Coastal Erosion Vulnerability Assessment demonstrating that the proposal will not result in an increased risk to life, or a significantly increased risk to property AND also demonstrate, substantial economic, social and environmental benefits to the community. It is not clear what these benefits may be or how the scale of the benefits will be judged, in order that proposals may meet this requirement. The Council's own evidence acknowledges the importance of tourist accommodation to the North Norfolk accommodation, and it is not clear what other evidence will be required. Furthermore, for those businesses seeking to relocate (or expand) from the Coastal Change Management Area to another coastal location outside of it, the Policy requires them to demonstrate that the long-term implications of coastal change on the development have been addressed. However, on the basis that the Coastal Change Management Area deals with coastal change over a 100 year period (up to 2105); and the Plan's period is only up to 2036, it is not clear why this is requirement is needed within the policy. Any development outside of the</p>	

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

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

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Policy SD12 - Coastal Adaptation

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

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

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

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

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

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

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

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

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

Policy SD14 - Transport Impact of New Development

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

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

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

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

Policy SD15 - Parking Provision

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

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

Policy SD16 - Electric Vehicle Charging

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

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

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

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

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Policy SD17 - Safeguarding Land for Sustainable Transport

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

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

Environment Policies

Policy ENV1 - Norfolk Coast AONB & Broads National Park

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>HRA/LVIA are undertaken. Another example of an AONB policy that has been tested is as follows and could be adapted or partly adapted: Permission for major developments in the Norfolk Coast Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it: a. conserves and enhances the Norfolk Coast AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment; c. meets the aims of the statutory Norfolk Coast AONB Management Plan and design advice, making practical and financial contributions towards management plan delivery as appropriate; d. in keeping with the Landscape Character Assessment by being of high quality design which respects the natural beauty of the Norfolk Coast, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p>	
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 486</p>	<p>ENV1 Environment Agency (1217223)</p>	<p>LP459,460,461</p>	<p>General Comments</p>	<p>One missing aspect which should be included is the consideration of designated bathing waters (bathing water directive) and Shellfish water sites in relation to the importance of maintaining good water quality to preserve the standards of these sites. North Norfolk has several designated bathing waters where the bacterial content of any waters discharging nearby can affect the status. Any development in the area draining close to a bathing water should be required to ensure that their discharges do not increase the bacterial content of the waters discharging to the sea where at all possible, in order to safeguard the quality of the bathing water Bathing waters are important for local tourism to this district. Paragraph 8.2 This section could be enhanced to include policies relating to other priority habitats including: • Chalk streams • Traditional Orchards • Ponds In addition, 'green infrastructure retention' and enhancement' could also be widened to include the creation of new green infrastructure, beyond what is already there. It is noted that reference to new and enhanced green infrastructure is made in paragraph 8.9. We have included further comments here. Paragraph 8.4 We are pleased to see that the plan is acknowledging the need for a Habitats Regulation Assessment. The Environment Agency would welcome the opportunity to comment on the HRA once complete. • Paragraph 8.9 We are pleased to see that following on from our response to paragraph 8.2, this section does include 'new' as well as enhanced green infrastructure. It would be beneficial if this point was made consistently throughout the document. Creating new habitat is essential in reaching the target of biodiversity 'net gain', and linking existing habitats through the creation of new woodland or wildflower corridor, field margins or even recreational greenspace. Paragraph 8.10 This paragraph acknowledges that</p>	<p>Noted: Consider comments in the development the policy and future iteration of the Plan.</p>

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

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

P399-187

Policy ENV2 - Protection & Enhancement of Landscape Character

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

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

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

Policy ENV3 - Heritage & Undeveloped Coast

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

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

Policy ENV4 - Biodiversity & Geology

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

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

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

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

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

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

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

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Policy ENV5 - Green Infrastructure

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV5	Natural England (1215824)	LP721	General Comments	GI is central to the planning process and policy points should include requirement for monitoring and evaluation of new GI especially in the case of habitat creation. We welcome the safeguarding and provision of Green Infrastructure delivered through Policy ENV 5. We agree that all development should include GI principals and deliver proportionate requirements. We recommend the Green Infrastructure Partnership as a useful source of information when creating and enhancing GI.	Noted
ENV5	Norfolk County Council (931093)	LP739	General Comments	Could additionally make reference to the Public Rights of Way network as a location for offsite enhancement where required	Noted:- Consider comments in the finalisation of the policy
ENV5	Gladman Developments, Mr Craig Barnes (1217131)	LP283	Support	The role of Green Infrastructure in supporting health and wellbeing of residents, together with the benefits for wildlife is recognised by Gladman. As such, Gladman always promotes sites which provides substantial amounts of high-quality green infrastructure, and which can connect to and complement existing green infrastructure. Gladman therefore broadly support the aims of this policy. Given its role within the policy, the Council will need to ensure that the Green Infrastructure Background Paper is made available and continues to be made available following adoption of the Local Plan. The Council should ensure that this evidence its kept up-to-date through future reviews of the Local Plan. Care should be taken by the Council in setting the language for the policy. The policy requires a detailed scheme setting out the Green Infrastructure provision for a development, however this wording does not account for the fact that some developments will be promoted as outline applications initially, where matters of scale, layout and landscape will often be offset to be determined at the reserved matters stage. Proposed changes: The policy should be reworded to account for this, requiring only sufficient information at the outline application stage to allow for decision makers to determine that the proposed development is capable or responding to Policy ENV5 at the detailed application stage.	Noted: support welcomed - Disagree (partly) - Consider comments in the development the policy and the finalisation of the approach to GI. Background paper no 5 Green Infrastructure was published as supporting information at the time of the consultation
ENV5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP508	Support	Policy ENV 5 – We support but there needs to be monitoring in place to ensure this is carried out	Consider comments in the finalisation of the policy and monitoring Framework
ENV5	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Encourages the provision of green infrastructure and recognises it can enhance individual developments as well as having a cumulative positive impact across the District. The policy should be formulated in such a way to ensure that green infrastructure provision on individual sites should however be proportionate and appropriate to the scale of development and should not overburden developer at the expense of other aspects of sustainable development. This will ensure individual developments remain viable and that the policy is effective and consistent national policy (NPPF paragraph 34).	Support noted. Consider comments in the development of the policy.

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

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Policy ENV6 - Trees & Hedgerows

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

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

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Policy ENV7 - Open Spaces & Local Green Spaces

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV7	Natural England (1215824)	LP722	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: all new development should provide adequate and proportionate open space provision. Green Infrastructure (GI) should be well-designed and multifunctional facilitating a variety of recreational activities whilst supporting biodiversity. Recommended that large developments include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. The Suitable Accessible Natural Green Space (SANGS) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in Nature Nearby, including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include: High-quality, informal, semi-natural areas · Circular dog walking routes of 2.7 km2 within the site and/or with links to surrounding public rights of way (PRoW) · Dedicated 'dogs-off-lead' areas · Signage/information leaflets to householders to promote these areas for recreation · Dog waste bins · to the long term maintenance and management of these provisions	Noted: Consider comments in the development of the policy
ENV7	Norfolk County Council: Norfolk Property Services (931093)	LP739	Support	Holt – Primary School and Playing field It is recognised that NNDC have proposed site H04 Land south of Beresford Road for residential development and provision of 2 hectares of land for a two-form entry primary school. If a new school were to be provided on this or an alternative site, there would be potential for the existing school site (alternative site H26) and playing field (alternative site H29) to be closed and redeveloped for residential use. NCC requests that the Local Plan state that should an alternative site be provided for a school that the existing school and playing field would become available for residential use. Notwithstanding the above, NCC is supportive in principle of policy ENV 7 of the First Draft Local Plan which would allow development on education and/or formal recreation areas where: 'the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity, quality and local accessibility and made available for use prior to the loss of the Education and Formal Recreation Area to be built upon.'	Noted the existing school site and playing field is within the settlement boundary. The sports ground is covered by an existing open land designation. Any changes to this will need to be assessed in line with the policy position on a case by case basis which states replacement by equivalent of better provision will need to be provided and in line with the requirements of the school provision and requirements of NCC as education authority.
ENV7	Gladman Developments, Mr Craig Barnes (1217131)	LP285	Support	The open space requirements of the Policy are acknowledged. Gladman note and welcome the flexibility provided within the policy to allow for off-site provision where supported by evidence. Gladman however consider that greater flexibility be provided, without the need for further work on the applicant's behalf. Examining Table 6 of Appendix 6, it is clear that there are certain typologies of open space that would not be appropriate or would not be possible to accommodate on small-medium scale sites. This includes parkland provision and facilities for outdoor sport. Where the scale of provision required, significantly exceeds that available on small-medium scale sites. Where this	Noted: The plan positively promotes the provision of high quality on site open space GI , enhancement and improvement of the existing strategic network in a flexible way. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to

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				<p>matter of fact issue arises, it should not be upon the applicant to demonstrate the need for off-site provision. Proposed changes: To improve the effectiveness of Policy ENV7, the Council should include a simplified version of Table 6 within the policy which sets out the Council's generalised expectations for open space provision according to type and scale of development. The adoption of this approach would provide for greater clarity and beneficial for the design process. Beyond this, Gladman consider that the Council should only require contributions towards various typologies of open space where it is demonstrated that there is insufficient supply, the development will create an insufficient supply, or where existing provision is of an insufficient quality. Where ample open space of that sought already exists there should be a zero requirement for new development to contribute to this type of open space. The adoption of this approach would provide for greater flexibility and could increase the scope provided for a development to provide a type of open space where there is a deficiency. The adoption of this approach would therefore significantly enhance the effectiveness of the Policy in addressing open space needs.</p>	<p>inform future site specific requirements including appendix 2</p>
<p>ENV7</p> <p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 503</p>	<p>Norfolk Coast Partnership, Ms Gemma Clark</p> <p>(1217409)</p>	<p>LP511</p>	<p>Support</p>	<p>Policy ENV 7- Would like to see biodiversity improvements included which will also offset damage to more sensitive sites.</p>	<p>Comments Noted: The council is working jointly across Norfolk authorities and with Natural England to develop an evidence base to inform local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with Habitats Regulations and a strategic solution to deliver mitigation necessary to avoid the likely significant effects from in-combination impacts of residential development that is forecast across Norfolk. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan.</p>
<p>ENV7</p>	<p>Blakeney Hotel (Mr John Long, John Long Planning Ltd) (1216065 & 1216646)</p>	<p>LP226</p>	<p>Object</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Blakeney Hotel owns a significant area of land at the northern part of The Pastures in Blakeney which is sectioned off from the rest of The Pastures area by a substantial fence. The Hotel strongly objects to the Local Plan's inclusion of its land at The Pastures within the Open Land Area's designation (Policy ENV 7). The Hotel considers that the area of land does not meet the definition of 'Open Land Area' as it is not an area of open land, it is enclosed by a substantial fence and is not publicly accessible. As such, it does not form part of the wider open space, has a different character and function than the rest of The</p>	<p>Noted, disagree: Under current Core Strategy (2008) the land forms part of the wider Pastures designation as an Open Land Area (OLA) - Policy CT 1 states 'Development will not be permitted except where it enhances the open character or recreational use of the land. The land also falls</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 504				<p>Pastures and does not make a positive contribution to the wider landscape character of the area. The Hotel wishes to use the land in connection with its business operation, which would not be permissible under Policy ENV 7. The Hotel considers that change of use of this area to car parking should be considered appropriate and the Local Plan changed to accommodate it, by allocating the land for hotel use, including parking.</p>	<p>within the North Norfolk AONB and Blakeney Conservation Area. The emerging Plan positively promotes the provision of high quality Open Space and improvement and is informed by the Amenity Green Space Study, 2018 identifies Blakeney Pastures (B1 AGS/BLA01) as Amenity Green Space. It is described as 'Accessible and highly valued amenity green space centrally located within the settlement. Forms a defining edge and green setting to the historic village core and gives a degree of separation from the later development to the south. Highly significant being one of the few areas of open space within the Conservation Area. Collectively the section forms an important part of the notable composite green space within the settlement and as ' Areas of open land make an important contribution to the appearance of an area and may provide opportunities for informal recreation. It is proposed to protect such land principally as a result of being free from built development and because of their wider contribution to the character of the area.' DLP – ENV 7 includes that 'Development on visually important Open Spaces (un-designated and those designated as Open Land Areas and Local Green Spaces) will not usually be supported.'</p> <p>In addition, the relevant part of Para 97 of the NPPF states that existing</p>

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

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

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

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

Policy ENV8 - Public Rights of Way

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

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

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Policy ENV9 - High Quality Design

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

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

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

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

Policy ENV10 - Protection of Amenity

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

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

Policy ENV11 - Protecting and Enhancing the Historic Environment

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

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

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

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Housing Policies

Policy HOU1 - Housing Targets for Market & Affordable Homes

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

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

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

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

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Page 521				<p>whether there is sufficient flexibility provided within the supply to ensure full delivery of the housing requirement over the plan period. As set out above, Gladman question whether there is evidence to support the level of windfalls expected by the Council over the plan period. Furthermore, as set out above Gladman do not believe that it is sound for the Council to include a windfall allowance in each year of the five-year supply. To address this, the windfall allowance should not be included for the first three years of the five-year period, thereby reducing the overall housing land supply by 405 dwellings. A further oversight is the absence of any deduction made to the commitment housing land supply as a result of non-implementation. Gladman consider that it is unrealistic for the Council to believe that 100% of its committed sites will be built as intended. A lapse rate should be factored in and is consistently factored in by other local planning authorities. Research conducted by MHCLG (then DCLG) in 2015 on a national basis suggests that between 10 and 20% of consents are not built out. Taking the lowest end of this range and applying a 10% deduction to the committed supply would lower the supply provided by commitments to 2927 dwellings. Applying the conclusion made above, the supply provided over the plan period is at least 730 dwellings less than set out in the Local Plan, meaning that the supply provided is only marginally above the assessed housing need with only a 2% buffer provided. The above findings illustrate how precarious the Council's housing land supply position is and is arrived at without examining the deliverability and delivery rate of the planned supply (noting the absence of a housing trajectory). Proposed Changes Re housing requirement: the Council should revise the Policy to read, "at least 10,860 dwellings will be delivered over the plan period". This wording makes clear the Council's commitment to meet its housing need in full and wholly reflects the NPPF. Re Windfall Gladman consider that a windfall allowance should not be applied for the first three years of the five-year period. The rationale of this approach is to completely avoid the three-year timeframe within which existing consents can be implemented before they lapse, thereby reducing the potential for double counting. The application of this would reduce the windfall contribution by 405 dwellings based on the Council's current windfall allowance. Re: Supply. in order to secure the deliverability of the Local Plan the amount of supply should be increased to provide for a 20% buffer against the housing requirement as a minimum. Based on the above position, Gladman</p>	

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

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				<p>providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration . It is recommended that a detailed assessment of Tourist Accommodation and the interrelationship with residential properties is commissioned. Housing Supply table at Policy HOU1 suggests that an allowance for approx. 5% buffer (11,611 dwellings compared to up to date need figure of 11,060 homes). It is suggested that the Council increases this buffer through the identification of additional sites for allocation. Position regarding the supply is as follows: • Completions (1st April 2016 to 30th January 2019) = 1,200 dwellings • Commitments (January 2019) = 3,252 dwellings • Total = 4,452 dwellings In order to meet the Council’s stated aim to deliver 11,000 new homes it would be necessary to identify new sites to accommodate a further 6,548 dwellings.</p> <p>However the Council is only proposing sites sufficient to accommodate 4,864 dwellings and is reliant on 2,295 dwellings to be brought forward as windfall development. Whilst this allows a degree of flexibility for sites to come forward , there is less certainty about the deliverability of new homes within the plan period. Paragraph 70 of the NPPF makes it clear that the Council needs to have compelling evidence that windfall sites will provide a reliable source of supply and consequently the District has to be realistic in such a position bearing in mind the scale of windfall it assumes will come forward and the importance of such an element as part of housing land supply. It is requested that the Council produces a Housing Trajectory to demonstrate how and when new homes, commitments and suggested allocations will deliver across the plan period in accordance with paragraph 73 of the National Planning Policy Framework. It certainly remains the case that the provision of new homes is a key priority with the NPPF and as set out in paragraph 59 of the NPPF confirms that it remains imperative that a sufficient amount and variety of land comes forward to meet he Governments objective of significantly boosting the supply of homes. In order to provide increased certainty it is requested that the Council reconsiders the potential Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. The Large Growth Towns are anticipated to receive 47.12% of all growth . In comparison, the Small Growth Towns are only anticipated to receive 17.04% a much smaller proportion of growth particularly when compared to the expected</p>	<p>more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. * Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.</p>

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				<p>19.76% growth to come forward as windfall development. Paragraph 6.8 of the Background Paper 1 'Approach to setting the Draft Housing Target' states "At any given time, between 8% and 11% of dwellings in North Norfolk are not available as permanent dwellings, although this figure is much higher in many of the coastal communities between Sheringham and Wells." This suggests that there may be a need to specifically increase the amount of housing directed to Wells-next-the-Sea to meet the needs of local people. It is requested that the Council reconsider its approach to housing distribution at Wells. In addition, the Council's Background Paper 2 'Distribution of Growth' states: "At a local level, 915 people on the housing waiting list have expressed a preference for living in Wells-next-the-sea, of which 55.19% require a 1-bed property with a further 28.96% requiring a 2-bed property. There are a total of 134 people on the housing waiting list with a local connection to Wells-next-the-sea and 76 people who currently live in Wells-next-the-sea. Of these two groups the vast majority, 49.25% and 52.63% respectively, require 1-bed properties." (Page 54) Despite the above suggestions that there is a need for more housing to be directed to Wells, the Council notes that the settlement is constrained by environmental considerations which has influenced the Council's approach to the distribution of housing at Wells. Whilst we acknowledge there may some environmental constraints, we also consider that the site put forward by the Holkham Estate at Warham Road can be designed in such a way to minimise its impact bearing in mind the sensitivities of other edges of the town which in our view have more significant impacts. In such a context, it is noted that the majority of ecological designations are situated to the north of Wells. The Council's current evidence base, HRA recognises that further assessment of all the proposed allocations is required going forward. If it is found that Wells is capable of accommodating additional development it should do so to better respond to the need for housing and to seek to reduce the impact of residential properties being used as holiday accommodation. We consider that the reference should be made to "approximate" number of dwellings within the table in HOU1. In respect of Wells, the Council is asked to consider more dwellings in the town and which is our view would not impact upon the broad thrust of the policies in the plan.</p>	
HOU1	Kelling Estate LLP (Mr Roger Welchman,	LP746,LP755	General Comments	<p>Paragraphs 9.7 and 9.8 Consistent with our comments on policy SD3 above it is considered that the Local Plan should allow for infill housing. The safeguards imposed by the criteria from Policy SD3</p>	<p>Comments noted : Development is directed towards the selected settlements outlined in SD3 • The distribution of growth is informed by the guiding</p>

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	Armstrong Rigg Planning) (1218427, 1218424)			together with other policy controls will be sufficient to control against inappropriate or harmful developments. They would however enable and encourage the provision of modest infill schemes of housing which could help sustain existing small settlements and support local service provision in an area characterised by a dispersed pattern of development and variable levels of service provision. It is also consistent with the Government's support, through paragraph 68 of the NPPF, for small sized sites which can be built-out relatively quickly	principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel.
HOU1	Rentplus UK Ltd (Mrs Meghan Rossiter, Tetlow King Planning) (1217083, 1217080)	LP262	Support	We support the Council in setting a separate minimum target for the delivery of affordable housing over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.	Support noted
HOU1	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning) (1218489, 1218491)	LP803	General Comments	The housing target for the plan period is described by Policy HOU1 as being "between 10,500 and 11,000 new homes over the plan period". This is based on a figure derived from the District's annual local housing need of 543 dwellings per annum, resulting in a precise requirement for the 20-year plan period of 10,860 dwellings. As a start point paragraph 60 of the NPPF states that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance...". To this end, the use of a range to describe the housing target for the plan period, starting at 10,500 dwellings, conflicts with the requirement of the NPPF that the local housing need of 10,860 should be a minimum. Secondly, the Council's own evidence base (Background Paper 1: Approach to Setting the Draft Housing Target, Figure 3) describes that, using the most up-to-date affordability ratio for the District, the annual local housing need figure actually increases to 553 dwellings per annum, resulting in a revised requirement for the 20-year plan period of 11,060 dwellings. To ensure that the Plan complies with the NPPF and plans for the delivery of this number of homes as a minimum this figure must comprise the lowest end of the range forming the District's housing target. It is also noted that the Council's adoption of the raw local housing need figure as the housing requirement for the plan period fails to consider any additional economic or social factors that may necessitate an additional uplift in the target. Paragraph 2.11 of Background Paper 1 states that "the	Comments noted :Phasing Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider comments in the finalisation of this policy.

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Page 526				<p>Council has concluded that because of the large size of the uplift resulting from Stage 2 of the standard methodology, further upward adjustments beyond the OAN requirement are neither necessary or supported by the evidence". Whilst we acknowledge that the local housing need figure already includes an adjustment to account for affordability issues of approximately 35% this in-built uplift is purely intended to balance existing pressures on the local housing market – it responds to current market conditions only. It does not therefore account for any future increase in housing demand because of economic growth strategies, unmet needs in adjacent districts or the requirement to meet affordable housing targets. Whilst the baseline housing need set out in the Council's Strategic Housing Market Assessment (SHMA) has since been superseded by the local housing need figure the document's assessment in relation to market signals uplift therefore remains relevant. Figure 96 of the SHMA identifies that, above and beyond demographic projections, an upward adjustment of 593 additional dwellings will be required prior to 2036 to allow a balancing of supply to account for the Norwich City Deal as well as broader market signals. Added to the updated baseline local housing need figure this would result in a revised housing target for the plan period of 11,653 dwellings. To this end Alternative Option 2 (HOU1B), referring to a housing target of 12,000 dwellings, should be included in the Plan to adequately address the objectively assessed needs of the District. Housing supply Firstly, and most fundamentally, it is noted that the supply across all sources detailed in Policy HOU1 amounts to 11,611 dwellings for the plan period. This figure falls below both the revised housing target of 11,653 set out above as well as the rounded target of 12,000 homes described by Option 2 of 'First Draft Local Plan (Part 1) Alternatives Considered' background paper. Allied with a significant reliance on unidentified windfall sites – 2,295 dwellings, or approximately 20% of supply – it is clear that there are sufficient grounds for concern that the plan presents no certainty that the minimum housing requirement can be achieved. This shortcoming should be addressed through the inclusion of additional demonstrably deliverable allocations across the District within both the LPP1 and forthcoming LPP2. We also have specific concerns in respect of the ability to achieve a minimum of 2,150 new homes at North Walsham by 2036, a figure which represents approximately 40% of all new homes to be delivered by way of new allocations. We understand that significant concerns are harboured by members of the development</p>	

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				<p>industry and Officers alike who universally regard the target for North Walsham as challenging. Growth at the town is to be delivered across two substantial sites of 350 and 1,800 dwellings respectively. The respective draft policies covering each site require the preparation of a comprehensive development brief to lead the schemes, to be agreed by the Council before any permission can be granted. The brief for the 1,800 dwelling site must also be subject of its own separate public consultation. Unusually for a comprehensive draft plan the LPP1 is not currently supported by any form of suggested housing trajectory demonstrating the rate at which new homes will be delivered at these sites or across the District as a whole. This conflicts with the requirements of paragraph 73 of the NPPF, that strategic policies should include evidence illustrating the expected rate of housing delivery over the plan period. Lack of such a trajectory suggests that the Council are not entirely confident in the ability of some of their sites to deliver within the plan period. . In the absence of the Council's own projections we have undertaken our own analysis of delivery at the North Walsham sites to understand how realistic the estimation is that over 2,000 homes can be delivered at the town by 2036. In terms of timescales, and drawing on the same evidence as before, we would anticipate that it is highly unlikely that first completions will take place on site until at least 2027. This accounts for the time taken to agree the development brief, the gestation period of any planning application and the delivery of up-front infrastructure.</p> <p>In respect of delivery it is once again expected that market interest in the site will be low. The up-front infrastructure cost will inevitably be substantial and the likely timescales until first delivery will require a significant level of developer commitment and faith in the continued buoyancy of the local housing market to see the project to fruition. At most we do not consider that more than two developers will be on site at any one time due to the presence of the other North Walsham allocation, with each developer delivering at a similar rate as stated above – approximately 40 dwellings per annum totalling 80 dwellings per annum across the site. This build rate would therefore represent a significant shortfall in delivery over the plan period, of just over 1,000 dwellings. The LPP1 is proposing a level of growth at North Walsham that is entirely unrealistic and certainly more than the market can accommodate. Based on our assumptions that first delivery will take place at the town in 2025 this would require the completion of 195</p>	

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				<p> dwellings per annum across both sites. The average rate of completions at the town over the last 6 years is 56 dwellings per annum.</p> <p> On the basis that an individual housebuilder delivers at the rate assumed by the Council's most recent Housing Land Supply Statement (June 2018) – that is a maximum of 40 dwellings per annum – this would require the involvement of a minimum of 5 separate developers active at the town at any one time. This scenario in itself is entirely unrealistic considering both the low numbers of volume housebuilders active in the District and the level of competition this would create at the town.</p> <p> Our client therefore has concerns that the Council's heavy reliance on delivery at North Walsham will result in a significant deficit in housing supply across the plan period as a whole. Our estimate is that this would be in the region of 1,000 dwellings. In addition, neither site should be relied upon to contribute towards the delivery of new homes during the first five years of the plan period due to the extensive lead-in time prior to first completions . Suggested amended policy wording</p> <p> To ensure that the LPP1 plans for the correct level of housing need across the District the housing target should be revised and the first paragraph of Policy HOU1 amended to read as follows: "The Council will aim to deliver between 12,000 and 12,500 new homes over the plan period 2016-2036. A minimum of 2,000 of these will be provided as affordable dwellings. To achieve this specific development sites suitable for not less than 5,250 new dwellings will be identified as follows..."</p> <p> This includes a requirement to deliver a further 750 dwellings on new allocations across the District to account for the uplift.</p> <p> In addition, the distribution of development should be amended to take into account the likely deficit in delivery at the North Walsham Western Extension. This would result in around 1,000 dwellings being redistributed across all other settlements in the hierarchy.</p> <p> Proportionately, the requirement to deliver 1,750 additional homes across the remainder of the settlement hierarchy, away from North Walsham, would require approximately 150-200 homes to be delivered by way of allocations across the 15 most sustainable Small Growth Villages identified earlier in this submission</p>	
HOU1	Norfolk Coast Partnership, Ms	LP517	General Comments	9.8 The Norfolk Partnership have undertaken a study of the issues of second homes which is available. A high proportion of second homes	Comments noted: Occupation of homes is not a matter for land use planning and there is no

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

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				immediately available and deliverable to help meet this requirement. Furthermore, we consider that the Council should treat the 10,500 – 11,000 homes as a minimum number to be exceeded in terms of identifying an appropriate number of allocations.	
HOU1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP620 LP622	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Provides the framework for housing delivery through the Plan period and identifies the C10/1 allocation. As per our response to policy DS 3, we support the identification of site C10/1, land at Runton Road / Clifton Park, Cromer. Further evidence to support the delivery of site C10/1 is included in the accompanying Delivery Statement. Supports the Plan’s aim to address the Objectively Assessed Housing Needs (OAN) in full. However, the Council may wish to consider whether a further uplift is required, given the identified housing need in Cromer (1,479 people on the housing waiting list expressing a desire to live in Cromer); second home rates in the district, the need to support employment growth in North Norfolk and the wider area; the need for the plan to take account of the latest affordability ratio (2018) published earlier this year; and to potentially address the under delivery that has occurred in previous years . Whilst we note that the Plan’s housing target is not yet finalised, and some of these issues may be taken into account as the Plan progresses, the Council may wish to consider whether an uplift of 40% more than the projected household formation/demographic based requirement would be appropriate, given that this is a relatively modest increase above the 35% uplift currently proposed. This additional ‘buffer’, would help to further mitigate the impact of second homes in the area; assist with dwelling affordability and take account of changing affordability ratios; help to deliver additional affordable homes; and address the potential needs of a growing workforce within North Norfolk and neighbouring authorities, including potentially North Norfolk’s contribution to help meet the Norwich City deal, if the uplift in housing numbers to support the City Deal cannot all be met within the Greater Norwich area. It would also act as a further ‘buffer’ should identified housing sites/windfall etc., not come forward at the anticipated rates; and potentially to take account of previous housing under delivery. A 40% uplift would equate to 563 new homes per annum (11,260 over the Plan period), which would help to bring the housing requirement more in line with the Strategic Housing Market Assessment (2017) figure of 574 dwellings per annum, which the SHMA suggests could be required to plan for growth arising from the</p>	Support noted. Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.

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Page 532				<p>Norwich City Growth Deal. We have also reviewed the Background Paper 2 Distribution of Growth. Pigeon supports the Council's assessment of Cromer as contained in the Plan and background material. Cromer provides a range of services, facilities, and a considerable range of job and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel long distances, particularly by the private motor car. Walking, cycling and public transport are all viable options for travel for people to meet their day to day needs, with many of Cromer's services, facilities and opportunities within walking and cycling distance of all parts of the town; and for travel beyond the town, regular bus services are available to Holt, Sheringham, North Walsham and Norwich; and regular train Services are available to Cromer, Sheringham, North Walsham and Norwich. As such we support the growth target for 909 new homes in Cromer over the plan period (592 on new allocations). However, as per our response to policy SD3, the Council may wish to consider whether more growth should be directed to Cromer given the extensive employment opportunities in the town (including the headquarters of North Norfolk District Council, which is a significant employer) and the number of people on the Council's housing waiting list who have expressed a preference for living in Cromer. Notwithstanding, the comments above, we confirm that land at Runtun Road/Clifton Park (site C10/1) is capable of delivering approximately 90 homes as part of a mixed-use scheme that will contribute to the housing target set out within policy HOU1, as set out in the Delivery Statement that accompanies this submission.</p>	
	HOU1	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>Paragraph 9.16 states that its local housing needs assessment is 543 homes per annum - 10,860 homes over the plan period. On the basis of this level of housing needs the Council have set a housing requirement in HOU1 of between 10,500 and 11,000 new homes between 2016 and 2036. Whilst we consider the Council to have applied the standard method correctly, we note that this assessment uses the median affordability ratio from 2017 rather than the 2018 ratio that were published earlier this year. We would agree with the later assessment of needs and it will be important that the Council plan for this higher number. PPG states that Councils can rely on this figure for two years following submission. However, if further evidence is published prior to submission the Council will need to reconsider is housing needs to ensure consistency with paragraph 60</p>

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				<p>of the Framework and its associated guidance. The Council recognise in the local plan that the standard method results in the minimum level of housing needs. Councils must therefore consider, as established in paragraph 60 of the NPPF and paragraphs 2a-010 and 2a-024 of PPG, whether the level of housing delivered will need to be higher in order to:</p> <ul style="list-style-type: none"> • Address the unmet needs arising in neighbouring areas; • Support the delivery of growth strategies or strategic infrastructure improvements; and • Help ensure the delivery of the Council's affordable housing requirements <p>Unmet needs Whilst it would appear that there are no unmet needs within neighbouring authorities at present it will be important for the Council to continue to monitor this situation through statements of common ground. Should it become evident that there is likely to be unmet needs arising within any neighbouring areas the Council will need to consider increasing its housing requirement. Economic growth. Paragraph 9.17 has considered whether employment growth within the Borough will require in uplift to the baseline housing needs assessment resulting from the standard method. The Council note in 'Background Paper 1' that they do not expect economic activity to change over the plan period. However, the Council continue to seek increased economic activity through the allocation of an additional 93 ha of employment land in policy ECN1, which when developed will generate a substantial number of new jobs. The Council will need to consider the impact of these allocations on jobs growth in North Norfolk and the whether an uplift in the Council's housing requirement is needed to ensure there are sufficient working age people to support these aspirations. Alongside this the Council will need to consider the areas ageing population and the fact that this sector of the population will lead to a shrinking workforce and potentially increase the need for housing growth beyond the established baseline. The Council outline in HOU1 their intention to deliver a minimum of 2,000 affordable homes over the plan period. What is not clear from the Local Plan or the Council's evidence base is whether this level of delivery will meet the affordable housing needs for North Norfolk. The Central Norfolk SHMA identifies the need for 17,450 additional affordable homes between 2015 and 2036. However, we could not find within the SHMA a separate breakdown of the need for affordable housing within each LPA covered by this assessment. The Council must state how many affordable homes are needed during the plan period to meet its own needs and the degree</p>	

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				<p>to which its proposed housing requirement and affordable housing policies will meet this need. If affordable housing needs are not being met in full then the Council will have to consider increasing its housing requirement to better meet affordable housing needs as mandated by paragraph 2a-024 of Planning Practice Guidance. Recommendations Firstly, any housing requirement must be stated as a minimum to ensure that this figure is not seen as a cap beyond which further development should not be delivered. Secondly, further evidence will need to be provided with regard to affordable housing needs and economic growth and whether either of these factors will require the Council to increase its housing requirement in HOU1. Housing Supply (HOU1) Policy HOU1 sets out in table 1 that the Council expects to deliver 9,316 new dwellings through existing permissions and new allocations. In addition to this supply the Council expects a further 2,295 homes will be delivered through windfall sites delivering a total of 11,611 new homes across the plan period. Whilst the HBF does not comment on the deliverability of specific sites we do consider it important that reasonable assumptions are made with regard to the deliverability of allocated sites and that windfall assumptions are justified. Whilst the Council will be aware that paragraph 73 the 2019 NPPF requires Local Plans to include a housing trajectory we also consider it helpful to include within the plan, or supporting evidence, detail of how each allocated site delivers over the plan period. In our experience this helps not only those commenting on the local plan but also the inspector tasked with examining it. Windfall The NPPF allows windfall to be included in anticipated delivery where there is compelling evidence that they will form a reliable source of supply. The Council's statement on five-year housing land supply indicates that the level of windfall is expected to be 135 dpa. This accounts for 22% of the homes expected to be delivered over the remaining plan period - 2019 to 2036. Whilst we recognise that delivery on windfall sites has been high in previous years the plan should be seeking to reduce the level of windfall and increase the number of small site allocations within the local plan in line with paragraph 68 of the NPPF. This requires the Council to identify in the development plan sites of less the 1ha that will deliver a minimum of 10% of its housing requirement. We would therefore recommend that the Council seek to allocate smaller sites across the Borough and reduce the level of windfall expected to come forward. This would provide greater certainty in the delivery of new homes with North Norfolk and allow</p>	

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				<p>any windfall to be considered a bonus rather than a necessity. Flexibility in supply The Council's proposed supply indicates that the Council have 5.5% buffer across the plan period. This is insufficient and provides limited flexibility within supply should any of the proposed allocations not come forward as expected. We would suggest that the Council needs to allocate further sites and reduce its reliance on windfall. We generally recommend that Councils identify delivery (including windfall) for at least 20% more homes than the stated housing requirement. Recommendations Whilst the Council states it has sufficient supply to meet its housing needs over the plan period, we do not consider there to be a sufficient buffer to for such a statement to be made with any certainty. At present the Council is reliant on high level of windfall to come forward in order to meet needs and has limited flexibility should delivery not come forward as expected. We would therefore suggest that the Council allocates sufficient sites to ensure a 20% buffer across the plan period to provide the necessary certainty that its housing needs will be met.</p>	
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 535</p> <p>HOU1</p>	<p>Glavenhill Ltd (Hannah Smith, Lanpro) (1218811)</p>	<p>LP736</p>	<p>General Comments</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported by Glavenhill Limited together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard National methodology. Glavenhill note the Council's concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and "this figure has rarely been achieved in North Norfolk" (paragraph 6.14, Background Paper 1). As such, and in order to give the Council the best chance of meeting its identified housing needs, Glavenhill consider that the Council should allocate sufficient sites to meet a minimum of 10,500 – 11,000 homes over the plan period. Furthermore, the setting of this target makes the identification of an adequate range of sites, particularly smaller sites within the Small Growth Villages like Badersfield all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront infrastructure before house building can commence.</p>	<p>Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan</p>
<p>HOU1</p>	<p>WSP Indigo, Miss Emily Taylor</p>	<p>LP632</p>	<p>Object</p>	<p>In the context of the national housing shortage, with a need for as many as 340,0001 new homes to be built per year, there is serious and immediate pressure on Local Planning Authorities (LPAs) to</p>	<p>Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1217127)			<p>deliver adequate amounts of land for housing. The housing need in North Norfolk has increased substantially compared to its historic requirement and levels of delivery. Previously the Council's Local Plan requirement amounted to 400 dwellings per annum. The Local Plan Part 1 identifies a housing need for 550 dwellings per annum, which is some 30% higher than the adopted Local Plan requirement. The significance of this increase is apparent in the Council's net additional dwellings as calculated in the Government's latest Housing Delivery Test results. North Norfolk District Council (NNDC) has delivered a total of 486, 442 and 555 dwellings over each of the past three years, only once meeting the target of 550 set in the emerging Local Plan. Clearly, it will be difficult for the Council to consistently meet this uplift unless the Local Plan adequately addresses this issue. The Draft Local Plan Part 1 identifies total growth, including allocations and windfall, to deliver 11,611 dwellings against a requirement of 10,680 dwellings based on the standard methodology. However, the Council states that it 'will wish to carefully consider the deliverability of the final housing target before submitting the Plan for examination'. This is not a reassuring stance to take and should be addressed by providing an adequate 'buffer' of suitable sites for development in the Local Plan, which will mitigate constraints to delivery. The Council is currently not identifying enough land for housing to ensure that a consistent rate of delivery is achieved across the Plan period. Paragraph 11 of the National Planning Policy Framework (NPPF) (2019) requires that LPAs should as a minimum meet their Full Objectively Assessed Housing Need (FOAHN) in their Local Plans in line with a presumption in favour of sustainable development. There should be no question of whether the Council is accepting its housing need as defined by the standard methodology given that this is a key feature of national policy and a requirement on all LPAs. The Council should not be challenging the number of homes it is required to provide but should be focusing on being proactive in identifying a considerable reserve of allocation sites to ensure that it does not under deliver, especially given its own stated concerns on the rate of delivery. Allowing for a buffer of sites will protect the Council against future uncertainties and risks to the implementation of permissions and allocation sites.</p>	<p>governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.</p>
HOU1	WSP Indigo, Miss Emily Taylor	LP632	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Council has not published an up-to-date calculation of its five-year land supply position in light of the new standard methodology target.</p>	<p>The Five Year Land Supply Statement 2019 has been published and is available on the Councils website, the Council can demonstrate a 5.73 year land supply.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1217127)			<p>This is a key flaw and omission in its evidence base and there is no justification as to why the latest supply calculation has not been provided alongside the Draft Local Plan Part 1. We have undertaken independent analysis of the Council's Interim Statement published in June 2018. Given that the Council has not supplied an update now that the standard methodology is established in the NPPF (2019), it is pertinent to consider the Council's supply against the updated housing need figure only. When assessed against the standard methodology figure of 538 dwellings per annum, the Council cannot demonstrate a five-year housing land supply when a 5% buffer is applied, as demonstrated in Figure 1. The Council's capability to provide land for housing declines considerably when higher buffers are applied. This puts immense pressure on the Council for sites to come forward through the Local Plan, given the many variables affecting the calculation of supply. It is essential that the Council identifies sufficient deliverable sites and plans for enough housing to maintain a robust rolling five-year housing land supply (inclusive of a 5% buffer) throughout the Local Plan period. In order to do this, NNDC must identify sites in its emerging Local Plan in sustainable locations that can come forward within the first five years of the Plan. Given that the latest completion data for 2018/19 has not been published, the table below may present a more positive position, particularly if completions for the past year have fallen short of the 538 dwelling target. As Figure 1 shows, the Council can only demonstrate 4.87 years' supply if a 5% buffer is applied. However, this assumes that all 2,837 homes included within the supply are deliverable in the next five years. Based on an initial assessment, we do not consider that all of these homes will be delivered in the next five years. Therefore, there is a clear shortage which is likely to be more severe than the shortfall identified using the standard methodology indicates. The Council must identify further sites that can come forward within the first five years of the Plan to rectify this position.</p>	
HOU1	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership (1217091 1217088))	LP291	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: White Lodge (Norwich) Limited are the sole owner of 'the Former Nursery site' identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a</p>	Support Noted.

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Page 538				<p>horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical or desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue.</p>	
	HOU1	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP581	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is important that the target for the provision of new homes in the District over the plan period to 2036 reflects the most recent housing evidence base and the standard methodology set out in the NPPF. Notably the standard methodology identifies a minimum housing need figure and, as such, the upper threshold of that housing need must be stated within the policy, rather than proposing a range of housing provision as currently drafted. The current draft is at risk of being interpreted as a fixed requirement, which is not in accordance with the standard methodology approach, and should be amended.</p>

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

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Policy HOU2 - Housing Mix

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

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

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

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Page 543				<p>urgency of the problem, we feel it is essential to do something - the reason why Homes for Wells was originally set up. In 9.7 infill growth is allowed on brownfield sites. In our Housing Needs Survey, the derelict units at Maryland were commented on by many responders. We are aware that the Flood Defence Agency opposes any development in this area but respectfully point out that there are many coastal areas where development takes place in flood risk areas - the homes have parking on the ground floor and the only inhabited parts of the dwelling are on the first floor or above. In 9.8 the Council...would welcome comments on this area of policy. Homes for Wells supports housing growth from many different sources and believes that a variety of smaller developments is preferable to any single large site, in terms of access on foot or bicycle to the town centre, limiting damage to wildlife and the natural environment and avoiding intrusion into the landscape. As to the impacts of second home ownership, the first is that parts of Wells are increasingly becoming 'dark' out of season; people no longer have neighbours, businesses no longer have customers, school numbers fall, family members move away to find work or affordable homes and the permanent population falls. The second is that, in high season, the isolated residents are disturbed at all hours of the day and night by strangers driving in and out; nobody knows who their neighbours are; in daytime, the roads gridlock and all available parking is taken; in short, the income and employment gained from tourism has to be smoothed out over the year. Providing more second homes for holiday lets in peak season does not smooth out the pressure - it adds to it - and it undermines the community and its services outside peak season</p>	<p>planning legislation, the occupation of residential dwellings is not a matter of land use planning and there are no planning controls that can be utilised to control the use of the existing housing stock as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers where there is an opportunity to bring forward additional growth in response to local issues and evidence. The Local Plan continues to address strategic needs of the District.</p>
HOU2	<p>Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd)</p> <p>(1216793, 1216790)</p>	LP235	Support	<p>Support the principle of introducing a sliding scale for affordable provision. However, the figures set out in the table do not allow sufficient flexibility to meet local needs. it is appropriate in North Norfolk that affordable housing targets allow for greater flexibility in respect of the scale of development proposed and affordable housing contributions sought on the basis of a sliding scale however, the figures set out in the table to not allow of sufficient flexibility to suit local needs</p>	<p>Support (partial) welcomed: The Council aims to ensure that the dwelling built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes, which are built with the identified need for homes of different sizes and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing</p>

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					needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period.
HOU2	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP565	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Holkham Estate is supportive of the 'Built to Rent' concept. The Planning Practice Guidance states: "As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups. If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent." Paragraph: 001 Reference ID: 60-001-20180913 (Revision Date: 13 09 2018). The North Norfolk District Council Strategic Housing Market Assessment (June 2017) provides commentary about the private rented sector (PRS) across Central Norfolk over the period 2001 to 2011 at pages 86 and 87. It is stated at paragraph 4.57 that "The rate of increase in the PRS is revealing: over the period 2001-11, the PRS sector in Central Norfolk has grown by 45%". It is stated at paragraph 4.58 that "It is important to recognise that the private rented sector in Central Norfolk is growing via the conversion of other tenures rather than new build." The SHMA indicates that there may be a need to accommodate additional growth to specifically respond to the growth of private rented sector. Unfortunately there is no analysis of the Private Rented Sector within the North Norfolk District in isolation. The Draft North Norfolk District Council Draft Local Plan is silent in respect of 'Build to Rent'. Build to rent is defined within the National Planning Policy Framework (Glossary) "Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control." The concept of 'Build to Rent' is different to traditional development schemes where houses are built for sale. This sector of housing can play a role in accelerating delivery where there is a particular need for rental properties</p>	Comments noted: Consider feed back in the development of policy and supporting text .The Council supports the provision of rented accommodation in meeting the identified need of affordable housing. A high proportion of affordable rent is included in the plan wide viability testing. Consider adding text references and or policy requirement on tenure mix to the final policy approach
HOU2	Wells Neighbourhood Plan, Questionnaire. (LP302	Object	Respondents to the questionnaire, (clarification added, Wells NP survey) counted 125 first preferences for affordable housing for rent by local people, 89 second preferences and 24 third preferences. By contrast houses for sale on the open market attracted 14 first preferences, 9 second preferences and 5 third preferences. The survey response	Comments noted. Addressing housing needs, both market and affordable is an important consideration in meeting all

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	Mr Peter Rainsford) (1216818)			reflects concerns about the very limited amount of land available for affordable rental accommodation. This could be resolved if all sites are designated "exception sites".	identified housing needs across the district and contributing to a balanced and sustainable community. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers to bring forward additional sites to support local affordable housing where they are justified by appropriate evidence.
HOU2	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP683	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Larkfleet object to the stringent nature of policy HOU2 and suggest that there is a greater need for flexibility to ensure development is viable on a site-specific basis and believe housing mix percentages should be addressed on a case by case basis. As an example, the number of required self-build and specialist properties, defined in this policy as a need, should be weighed against the need for affordable homes.	Noted, consider comments in the development of the Policy HOU2. The Council aims to ensure that the dwellings built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes, which are built with the identified need for homes of different sizes and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to be high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period.
HOU2	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP496	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Persimmon Homes (Anglia) request that the discrepancy between the housing mix requirements of HOU2 and other relevant policies within the plan are revised so that they align: • HOU2 does not require the provision of specialist elderly/care provision on schemes of	Noted: Consider clarification in future iteration of the Plan HOU2 & DS13. Provision for elderly care accommodation is required on DS13.

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

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Page 547				<ul style="list-style-type: none"> It is considered that, if allocated sites are not coming forward at the anticipated rate of the adopted housing trajectory or if the Council is unable to demonstrate a 5 year housing land supply, this should trigger the delivery of the reserved sites for consideration. This would ensure that the Council are meeting their housing need, whilst also ensuring that housing is coming forward in the most sustainable locations, as this would have been a factor in determining the location of the reserve sites. Mechanisms to avoid a shortfall in housing development and delivery are vital to consider at this stage of the emerging Local Plan. Taylor Wimpey UK Ltd object to the prescriptive nature of policy HOU2. Greater flexibility on a site by site basis is required to ensure schemes are viable. For example, the need to provide self build plots and the provision of specialist elderly/care beds in accordance with this policy needs to be weighed against the need to provide the prescribed level of affordable housing. As required by National Planning Policy, we consider that the Council should seek to provide a range of housing tenures, in accordance with the most recently published SHMA, and that the precise percentage of housing mix should be dealt with on a case by case basis and be informed by site location. 	<p>and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging polices on the economic viability of the development expected to be delivered through the Local plan. Government policy is clear in that the policies of adopted plans are expected to be reflected in land purchase price and as such developers should take account of the policies in developing proposals and negotiating land sales.</p>
	HOU2	Rentplus UK Ltd (Mrs Meghan Rossiter, Tetlow King Planning) (1218446, 1217083, 1217080)	LP764, LP265	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Rentplus UK Ltd supports the Council’s aspiration to deliver more affordable housing across North Norfolk. This should translate to the supporting text and policies supporting the delivery of the full range of affordable routes to home ownership, including rent to buy, such as at para. 9.25. The affordable rent to buy tenure meets needs for affordable rented housing, with the full expectation of purchase. We support the Council in setting a separate minimum target for the delivery of affordable housing over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.

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

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	(1218497 1218496)			needs to be the ability to give consideration on an individual site basis as to whether there is an identified need for self-build plots, elderly care in a particular location.	
HOU2	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The landowner supports development at Fakenham. However, alongside this, the Plan should ensure that the needs of the rural areas of the District, such as affordable housing, are considered and adequately met to ensure the fostering of thriving communities. This would support a positively prepared plan that is justified and sound. Supports provision of new housing to meet local need and acknowledges that the housing need figure of 543 per annum is consistent with the national Standard Method. Recognises the need for a mix of housing in new developments to ensure balanced communities are created and maintained, and to ensure needs of all population groups in the District are adequately met. However, the policy should not be overly prescriptive to ensure there is flexibility to respond to the changeable market situation and any changes in the District’s demographics over the Plan period. Policy HOU2 should encourage all different routes to affordable housing to ensure those in need have the best access possible to affordable housing. This would also ensure consistency with the updated NPPF which is much broader in defining affordable housing (paragraph 62 and Annex 2). Policy language should be consistent with NPPF paragraphs 62-64. Exemptions, including those for self-build, should be identified as per NPPF paragraph 62, and vacant building credit should also be referenced as per paragraph 63. There is also ambiguity regarding the “agreed dimensions” in table footnote 2 – what are such agreed dimensions and how are they justified? With regard to the different affordable housing zones, NNDC should ensure this responds to previous affordable housing delivery trends, so that affordable housing is delivered in areas of greatest need. The supporting text of Policy SD3 notes that larger towns have the greatest need for affordable housing, but also have the greatest supply. However, care should be taken to ensure that the affordable housing needs of village and rural communities are not neglected, particularly those with high demand and low land availability, such as Mundesley. While Background Paper 2 - Distribution of Growth states there is greatest demand for affordable housing in the Large Growth Towns, there does not appear to be any evidence to support this notion and affordable delivery rates in these areas are not discussed. NNDC must be certain that affordable housing can be successfully delivered in areas of greatest need to ensure a justified and effective Plan. Sites like F03 (Fakenham) can, of course, help support such delivery in the short term.	Support noted. Consider comments in the finalisation of the policy wording. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community.
HOU2	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP623	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Formulated based on the SHMA and other evidence base documents. It identifies site C10/1 being located within Affordable Zone 2 and cross references tenure mix dependent on the size of scheme. We support the policy and confirm that the Concept Masterplan, which accompanies this submission provides for a scheme that complies with policy HOU2, notably the provision of 35% affordable housing and the requirement for 50% of market	Support noted. Consider comments in the development of the policy.

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

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				<p>development viability can be greatly affected by the mix if there is no market for such homes at the location the development is being delivered. Recommend that the housing mix requirements for market homes in HOU2 are deleted. HOU2 requires at least 1 plot or 2% of the total number of units provided to be self-build. Whilst the HBF is supportive of the self and custom house building industry we are concerned that the expectation to deliver such plots is being placed on the house building industry. PPG sets out in paragraph 57-025 a range of approaches that must be considered to support the delivery self-build plots, such as examining whether delivery could be achieved on their own land or if their landowners willing to provide development land specifically to support the self-build market. The Council will need to provide evidence as to the extent they have considered delivery through other mechanisms if this policy is to be found sound. In addition to considering how to deliver plots for self-builder the Council must also provide evidence as to the demand for such plots. We are particularly concerned that across the Country the level of need outlined on self-build registers is inflated and does not reflect demand. We have noted that when Councils have revisited their registers in order to confirm whether individuals wish to remain on the register numbers have fallen significantly. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the numbers of interested parties on the register fell from 155 to just 3. There are also concerns that self and custom build registers alone do not provide sufficient evidence with paragraph 57-011 of PPG requiring additional data from secondary sources to be considered to better understand the demand for self-build plots. In particular we are concerned that planning policies, such as the ones proposed in the draft local plan, will deliver plots on major house building sites whereas the demand for self-build plots may be for individual plots in more rural locations. Without the necessary evidence to show that there is demand for self-build plots on such sites the policy cannot be either justified or effective. The Council will need to provide further evidence if it wishes to take this policy further. Without the necessary evidence the policy must be deleted. If the policy is retained it must include a mechanism for the return of self-build plots to the developer where these are unsold. It is important that plots should not be left empty to detriment of neighbouring dwellings or the development as a whole. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.</p>	
HOU2	National Custom & Self-Build Association (Ms Sally Tagg, Foxley Tagg Planning	LP704	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NaCSBA’s mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process. The Self-build and Custom Housebuilding Bill is an Act of Parliament. This Bill seeks to establish a register of prospective custom</p>	Noted - Consider feedback. Consider the level of need identified and how that relates to the potential provision and the locational requirements as detailed through

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Page 552	Ltd) (1218368 1218503)			<p>builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that North Norfolk do keep a self-build register and that demand identified through the self-build register is published. It is however a concern that at present one cannot register on the North Norfolk Self-Build Register at http://localselfbuildregister.co.uk . The lack of presence on this website can give the impression that the LPA does not have a self-build register, and may send the wrong message in respect of the Council's commitment to the register and to custom- and self-build. Comments from the Planning Minister alongside the Right to Build legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination. The Housing and Planning Act 2016 conferred on LPAs the responsibility to: "Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority's area..." The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act. The Housing White Paper entitles 'Fixing Our Broken Housing Market' published in February 2017 stated that: "the Government wants to support the growth of custom built homes. These enable people to choose the design and layout of their home, while a developer finds the site, secures planning permission and builds the property." The paper further went on to acknowledge that: "The main barriers to custom built homes are access to land and finance." Finally, the paper demonstrated the importance with which the Government treats provision of self-build opportunities by councils by stating that: "If we do not believe local authorities are taking sufficient action to promote opportunities for custom-building and self-building, we will consider taking further action including possible changes to legislation." More recently, Housing Minister Kit Malthouse stated in the House of Commons (13th May 2019) that: "Self and custom builders have a vital role to play in delivering new homes that are welcomed in their communities, rather than resisted, and built to last." He went on to state that: "Custom and self-build can and should be a mainstream housing option in this country."</p> <p>Paragraph 61 of the revised NPPF sets out the requirement for LPA to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis): "The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people</p>	the council's self build register and potential amendments to the policy .

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				<p>wishing to commission or build their own homes).” Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. Critique of policies Whilst the plan does make reference to custom and self-build in Policy HOU 2 – Housing Mix, in the form of a requirement for medium and large sites to deliver 2% of units (or at least 1 plot) as serviced self-build plots, this is the sole reference to custom and self-build in the plan. As such, the opportunities for those wishing to build their own home might be limited, given that the only plots that the local plan will help to deliver will be those on large sites. Plots on large developments do not always suit the needs of prospective custom and self-builders, and consequently more choice should be offered, with smaller sites being facilitated too. It is concerning that no other mention of custom and self-build is made within the plan. Given the emphasis that the government wishes to place on custom and self-build it is considered crucial that housing policies within the emerging plan make reference to the fact that LPAs have a duty to meet the needs of those wishing to build their own homes. It is therefore considered appropriate that policy HOU2 should be adjusted in order to ensure that it is made clear that self-build is supported and actively encouraged to come forward through windfall sites. As such there is currently no provision within the plan to ensure that the needs of those wishing to build their own home are met, unless those prospective self-builders want a site on one of a handful of large sites expected to be brought forward during the plan period. The NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and positive promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. North Norfolk DC should give serious consideration to a policy which encourages small and medium sites specifically to meet the needs of custom and self-builders. At present NaCSBA are concerned that the emerging Local Plan does not meet the needs of those wishing to build their own home, does not meet the council’s responsibilities in this regard and could not be considered sound at examination as a result. Conclusion The Local Plan does not support custom and self-build other than limited provision on a small number of large sites. Policy HOU2 should be altered to make clear that custom- and self-build proposals within the district are encouraged and will be supported in order to comply with the NPPF, the Housing & Planning Act and the Right to Build.</p>	
HOU2	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP308	Object	<p>Issues and concerns were raised at the Council-run Viability Workshop (29 August 2018) about the basis and assumption by NCS (authors of the Plan Wide Viability Assessment, July 2018). Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of the - in particular – 35% affordable housing level proposed by</p>	<p>The council took on board comments made at the viability stakeholder event, a revised study informed the emerging policies and was republished alongside the draft</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 554				<p>the draft Plan in Affordable Housing Zone 2. It is evident that a substantial proportion of proposed allocations (notably in North Walsham and Fakenham) are in Affordable Housing Zone 1, meaning that proportionately lower affordable housing rates will be delivered, even from the large allocations proposed therein. We have - elsewhere through this consultation exercise – indicated that there should be a better distribution of proposed housing allocations, particularly within the Large Growth Towns and Small Growth Towns categories of the Settlement Hierarchy (including an additional allocation in Hoveton). This point is reinforced by the implications thereof – as proposed by the Draft Plan – insofar as affordable housing provision is concerned: some redistribution away from single large allocations in Zone 1 towards Zone 2 will result in an increased provision of affordable housing. The Housing Incentive Scheme introduced by the Council was both innovative and effective. It is our view that its 25% level of affordable housing – which proved so effective in securing early delivery of housing (both market and affordable) should be maintained in Zone 2 through the new Local Plan.</p>	<p>plan consultation documents. Detailed feedback including the revised costings are included in the Interim consultation statement Appendix L. and the study is available in the Councils web site. Following the event, the study appraisals were subsequently re run with updated assumptions in relation to the suggestion of increased build costs along with a review of other inputs. The revised costs are based on independent data provided through BCIS as advised in the updated Planning Practice Guidance plus a percentage allowance for additional external costs. A further £10 sqm is added for category 2 Accessible and adaptable housing. Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of the policy requirements in the emerging allocations. A 17.5% developers profit is used, reflecting the reduced risk of building in North Norfolk as agreed at the meeting. The revised study also reflects the areas of higher value areas outside the main indicative zones. The affordable housing mix was reviewed to ensure it remains NPPF (July 2018) compliant and reflect the more realistic requirements of North Norfolk. The larger strategic typologies include a requirement for flats which are now based on the lower national space standard of 50</p>

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					sq m for a 1 bed rather than a 2 bed. Sales values, fees, finance etc. were not at this stage reviewed, given the iterative nature of plan making further work in refining values as well as costs will be undertaken at a stage to inform policy development. The study clearly identifies different affordable housing zones.
HOU2	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP584	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The policy proposes a significantly reduced proportion of affordable housing in conjunction with residential developments compared to the current Core Strategy (adopted Policy HO 2 requiring 45% for developments of 10 dwellings or more), based upon their location within the District. Within Fakenham the policy proposes at least 15% affordable homes are provided. This is considered to be more representative of the viability of development in this location. As such, support this approach on the basis that all development will remain subject to the normal viability tests and, therefore, treated on a site-by-site basis. In practice the policy may result in the viability of development being tested only in exceptional circumstances, however, the residual potential need for a viability appraisal should remain explicit within this policy.	Support noted. Noted Consider comments in the finalisation of the policy.
HOU2	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership) (1217091 1217088)	LP292	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Local Plan acknowledges that affordability is an issue throughout the district. In order to address this, Policy HOU2 (Housing Mix) seeks to ensure that small sites of 6-25 dwellings provide either on-site or off-site contributions to affordable housing, dependent upon whether their provision exceeds 10 dwellings or not. HOU2 restricts mix and applies affordable housing requirement. Difficult to identify which zone the Former Nursery site lies. Paragraph 9.26 of the draft local plan describes how, to date, it has only proved possible historically to achieve 18% affordable dwellings on new development sites. Paragraph 9.27 explains that 20% is a rate which is supported by the current evidence base. It is therefore unclear how provision levels of 15-35% have been arrived at, and are thus necessary or justified, other than the fact they are the maximum viable levels arrived at in the NCS Interim Plan Wide Viability Assessment. Paragraph 63 of the NPPF directs that affordable housing should “only be sought on major developments of ten dwellings or more”. Central government’s approach acknowledges that critical viability issues are commonly experienced on smaller sites. Their delivery is therefore encouraged by relaxation of the affordable housing requirements, as these sites make an important contribution to meeting the housing requirement of an area. HOU2 restricts flexibility in the mix to be provided on smaller sites. Restrictions in Policy SD3 are justified to meet paragraph 68 targets and ensure densities proposed reflect the rural character. However, we remain	Noted- North Norfolk is a designated rural area and therefore emerging policy is consistent with Paragraph 63 of the NPPF.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				unclear as to how thoroughly the impact of these restrictions has been assessed: the NCS Viability Assessment does not specifically evaluate these constraints in combination. Thus, we are concerned that the approach adopted will not be an appropriate solution to meeting the identified affordable housing need in the District, as it will not encourage small sites to be brought forwards due to viability concerns in Small Growth Villages. We therefore raise objection to the housing mix requirements of Policy HOU2 regarding sites of 6-25 dwellings on the basis that it is not consistent with approach advocated in national policy, which would suggest that no forms of affordable housing should be sought on sites comprising 0-9 dwellings. Failure to address this inconsistency raises potential issues for the legality of the plan and its soundness. We also request that a separate viability assessment is commissioned to examine the policy interaction on small sites in Small Growth Villages, to ensure the plan is effective in meeting the identified affordable housing need on a District level.	

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

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

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

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

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

Policy HOU4 - Agricultural & Other Key Worker Accommodation

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

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

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

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

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

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Policy HOU6 - Replacement Dwellings, Extensions & Annexed Accommodation

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

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

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

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

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

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Policy HOU8 - Accessible & Adaptable Homes

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

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

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

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

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

Policy HOU9 - Minimum Space Standards

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

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

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

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

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

Policy HOU10 - Water Efficiency

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response	
Page 571	HOU10	Anglian Water (1217129)	LP354	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. We would fully support the optional water efficiency standard being applied within the North Norfolk Local Plan area. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems. Further details of Anglian Water's approach to green water proposals is available to view at: https://www.anglianwater.co.uk/developers/green-water.aspx . We would ask that Policy HOU 10 be amended to refer to specific measures which would allow developers to improve go beyond this standard which has wider benefits and that these will be encouraged by the District Council. Proposed that Policy HOU10 be amended as follows: 'For residential development, proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2 Water reuse and recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.'	Support welcomed: Consider feedback in the development of the policy
	HOU10	Natural England (1215824)	LP724	General Comments	We understand that a water cycle study is being prepared to form part of the North Norfolk Local Plan evidence base. This information should feed into the evolving HRA and Sustainability Appraisal.	The Council has worked with infrastructure providers and the EA. to consider constraints and capacity issues including water supply, wastewater and its treatment in the development of the Plan

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

Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 573				<ul style="list-style-type: none"> • There should be carbon off-set modelling for an entire project, so that we work towards a whole development being carbon neutral. We are losing a lot of land and we will be generating a lot of greenhouse gases, which must be offset this somehow. • There is also the case of our area experiencing ever increasing water stress, therefore, new builds should be designed for maximum water capture and recycling. 	<p>seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole.</p>
	HOU11	Historic England (1215813)	LP705	Object	<p>Listed buildings, buildings within conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations/exceptions should be reflected in the policy.</p> <p>In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings</p>

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				development proposals should be accompanied by a separate Sustainability Statement..." appears especially onerous. Does the policy actually mean all development proposals (i.e. all planning applications)?	

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

Economy Policies

Policy ECN1 - Employment Land

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

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

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

Policy ECN2 - Employment Areas, Enterprise Zones & Former Airbases

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

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

Policy ECN3 - Employment Development Outside of Employment Areas

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

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

Policy ECN4 - Retail & Town Centres

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

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

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Policy ECN5 - Signage & Shopfronts

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

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

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

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 584				<p>providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration for the emerging North Norfolk District Council Local Plan. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies: • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Support is given to Policy ECN 7 which provides additional flexibility for the provision of caravans and camp sites beyond settlement boundaries, where the site does not lie within the AONB, to reflect the seasonal nature of this tourist accommodation. Some support is given to the flexibility of the criteria at Policy ECN 6 and ECN 7 for expansion of existing tourist accommodation. Whilst recognised that there is a need to conserve and enhance the AONB it is requested that additional flexibility is incorporated to draft Policy ECN7 to allow for appropriate high quality new tourist development which complies with other relevant Local Plan policies, including Policy ENV 2 ‘Protection & Enhancement of Landscape & Settlement Character’ and Policy ENV 4 ‘Biodiversity and Geology’ to come forward within the AONB, particularly if the accommodation is seasonal in nature. Footnote 93, referenced at Policy ECN7, defines ‘touring caravan and camping sites’ as sites for touring caravan and camping sites, glamping, yurts, tepees and shepherd’s huts. We welcome this definition for clarity. On a more general basis, in respect of sites situated beyond the settlement boundary, it is requested that the Council considers the potential for well-planned tourist accommodation to be located sites along main transport routes and in proximity to public transport links. Again it will be necessary for these sites to comply with other relevant Local Plan policies, including Policy ENV 2 ‘Protection & Enhancement of Landscape & Settlement Character’ and Policy ENV 4 ‘Biodiversity and Geology’. In the interest of farm diversification, we would welcome specific reference within policy to the reuse of appropriate scale agricultural buildings for tourist accommodation where proposals comply with other relevant Local Plan policies. Retaining an Adequate Supply and Mix of Tourist Accommodation In addition the Council is proposing a Policy ECN 9 to seek to retain an adequate supply and mix of</p>	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 586				<p>site is located within a short walk (15 minutes) from Cromer centre, which provides a wide range of services including restaurants, supermarkets, post office, banks and pubs. Furthermore, regular bus services (every 15 min) provide transport to Cromer (5 minutes) and from there train travel is possible to surrounding larger cities such as Norwich (45min). In respect of this site, the Caravan and Motorhome Club would like to extend its Seacroft Caravan and Motorhome Club Site located at Cromer Road, East Runton, Cromer, NR27 9NH – please find enclosed an indicative site plan for reference. This extension could include additional touring pitches, lodges and camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Caravan and Motorhome Club can continue to meet the changing needs of its members. On this basis, the below policy changes discussed in the ‘Emerging Local Plan’ are sought. Inleboro Fields Caravan and Motorhome Club site is located to west of the Seacroft site, closer to the settlement of West Runton. The site is located within the Links County Park golf course and is accessed from Station Close to the north. The site extends to circa 8.5 hectares (21 acres) and provides a total of 261 primarily grass touring pitches for caravans and motorhomes. The site also includes an information/reception room, shower room, dishwashing area and toilet block. The site itself is well screened on all sides by dense vegetation and has an internal tarmacked circulation road which provides access to the touring pitches. The site is located just a short walk from West Ruston which provides services and facilities for visitors. The nearby towns of Sheringham and Cromer provide a greater range of facilities and services and both can be accessed in less than 20 minutes via a local bus service. In respect of this site, the Caravan and Motorhome Club would like to diversify their offer to provide pods and lodges. The site is well screened and therefore, static pods and lodges will have a limited impact on the surrounding landscape and ecology. There are existing touring pitches and therefore, the diversification to lodges will not impact on the surrounding landscape. On this basis, the below policy changes discussed in ‘Emerging Local Plan’ are sought. Policy ECN 6 is written in respect of existing static caravans and lodges. This policy should also take into account existing touring caravan sites which could diversify and improve their offer, to provide pods and lodges. While it is noted that static lodges can impact on the surrounding landscape, if this is considered appropriately within a submission, in principle the diversification should be supported. As such, the following sentence should be included within Policy ECN 6 or 7: The diversification of touring caravan pitches to static lodges or pods will be supported where:</p> <ul style="list-style-type: none"> • the proposals are for the expansion of an existing business; • there are no significantly detrimental impacts on the area’s landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network; and • the 	

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

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

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

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 590				<p>there is a need to conserve and enhance the AONB it is requested that additional flexibility is incorporated to draft Policy ECN7 to allow for appropriate high quality new tourist development which complies with other relevant Local Plan policies, including Policy ENV 2 'Protection & Enhancement of Landscape & Settlement Character' and Policy ENV 4 'Biodiversity and Geology' to come forward within the AONB, particularly if the accommodation is seasonal in nature. Footnote 93, referenced at Policy ECN7, defines 'touring caravan and camping sites' as sites for touring caravan and camping sites, glamping, yurts, tepees and shepherd's huts. We welcome this definition for clarity. On a more general basis, in respect of sites situated beyond the settlement boundary, it is requested that the Council considers the potential for well-planned tourist accommodation to be located sites along main transport routes and in proximity to public transport links. Again it will be necessary for these sites to comply with other relevant Local Plan policies, including Policy ENV 2 'Protection & Enhancement of Landscape & Settlement Character' and Policy ENV 4 'Biodiversity and Geology'. In the interest of farm diversification, we would welcome specific reference within policy to the reuse of appropriate scale agricultural buildings for tourist accommodation where proposals comply with other relevant Local Plan policies. Retaining an Adequate Supply and Mix of Tourist Accommodation In addition the Council is proposing a Policy ECN 9 to seek to retain an adequate supply and mix of tourist accommodation. The Council acknowledges at paragraphs 10.62 of the Draft Local Plan "...that tourist accommodation is sometimes under pressure for conversion, often to residential, particularly in locations where new residential properties are more strictly controlled." The Council should commission evidence base documents which specifically considers the implications of tourism pressures upon existing housing stock and to ensure that sufficient housing planned for to meet the needs of local people.</p>	
ECN7	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP526	Support	Support	Support welcomed
ECN7	Caravan and Motorhome Club (1218484)	LP790	Support	<p>This representation relates specifically to Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges and Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites. The Caravan and Motorhome Club has two well performing sites in North Norfolk District; the first is Seacroft Caravan and Motorhome Club Site (location plan enclosed); the second is Inleboro Fields Caravan and Motorhome Club Site (location plan enclosed). A brief site and surrounding description is outlined below. Site and Surroundings Seacroft Caravan and Motorhome Club Site is located to the west of the town of Cromer. The site is accessed off Cromer Road to the north, which provides access to the main town of Cromer to the east and West Ruston</p>	Support noted - consider the proposed alterations to the text and potentially the addition of 'pods' within footnote 90 to ensure these are included within the definition of the policy.

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 592				<p>where: 1. the site lies within the settlement boundary of a selected settlement; or 2. the proposal is for the expansion of an existing business; or 3. the site lies outside of the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3;(94) 4. in all cases there is no significantly detrimental impacts on the area's landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network. Taking the above points in order, the Caravan and Motorhome Club has no comment in respect of point 1, as it is seeking changes in policy to take into account existing sites more proactively. In terms of point 2, the Caravan and Motorhome Club supports the inclusions which allows for existing businesses to expand to take into account additional growth. In terms of point 3, the Caravan and Motorhome Club largely supports the approach being taken here, however, sites should be considered on a site by site basis. Where landscaping and surrounding vegetation surround sites within the AONB, policy should allow their expansion. The impact of increased caravans on the surrounding landscape will be limited due to the surrounding vegetation. In terms of point 4, the Caravan and Motorhome Club largely supports the approach being adopted here. However, this approach should be replicated for sites within the AONB. If there is no significant impact upon the landscape, ecology and amenity, then development proposals which seek to improve the offer, and thus the local economy, should be supported.</p>	

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

Policy ECN8 - New Build & Extensions to Tourist Attractions

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

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

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

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

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

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

Vision, Aims & Objectives

Vision, Aims & Objectives

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Vision & Aims	National Grid (931752)	LP737	General Comments	No comments to make in response to the consultation	Comments noted
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 2.16 Welcome reference to the character of the area but would be helpful to include specific reference to the natural and historic environment in this bullet point.	Noted - consider amendment to bullet 4 of paragraph 2.16 in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Aims and Objectives. Welcome reference to the character of the area but would be helpful to include specific reference to the natural and historic environment in this bullet point.	Noted - consider amendment to bullet 2 of the Aims and Objectives in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 2.19. Should specifically mention the historic environment and not just conservation areas and listed buildings	Noted - consider amendment to wording of paragraph 2.19 in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Duty to Co-operate: Should Historic England be mentioned in this paragraph relating to the Historic Environment.	Noted - consider amendment of the section regarding the Duty to Co-operate in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 3.8: Historic England would expect to see a comprehensive and robust evidence base and recommend the following are added to the evidence base: - National Heritage List for England. www.historicengland.org.uk/the-list/ - Heritage Gateway. www.heritagegateway.org.uk -Historic Environment Record. - National and local heritage at risk registers. www.historicengland.org.uk/advice/heritage-at-risk - Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas) -- Conservation area appraisals and management plans - Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/ - Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project. www.cravenc.gov.uk/CHttpHandler.ashx?id=11207&p=0 - Detailed historic characterization work assessing impact of specific proposals. - Heritage Impact Assessments looking into significance and setting especially for strategic sites or sites with specific heritage impacts - Visual impact assessments.	Noted - A comprehensive document library will be compiled for the submission of the Local Plan. Consider Historic England suggested documents for inclusion within the document library.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				- Archaeological assessments. - Topic papers.	
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 3.8 Historic England advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and show this has translated into the policy choices you have made. It is also useful to include in this a brief heritage assessment of each site allocation, identifying any heritage issues, what you have done to address them avow this translates into the wording in your policy for that site allocation policy.	Noted- Consider the production of a topic paper in regard to the Historic Environment.
Vision & Aims	Historic England (1215813)	LP705	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 4.12 We very much welcome this excellent paragraph on local architectural style and traditions. A good understanding of the historic environment is key to ensuring future development is in keeping with this and builds upon this historic tradition.	Support noted
Vision & Aims	Historic England (1215813)	LP705	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 5.2 Historic England welcomes the paragraph on Climate Change	Support noted
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Protecting the Natural and Built Heritage of the District: Historic England suggest that the word built heritage is changed to historic environment. Historic Environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.	Noted - consider amendment to heading on page 35 in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 5.14: The current preferred term is Registered Parks and Gardens - delete the word historic	Noted - consider amendment to delete the word historic in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 5.14: Consider the inclusion of Felbrigg Hall in this paragraph	Noted- consider the inclusion of Felbrigg Hall in this paragraph in the preparation of the plan.
Vision & Aims	Historic England (1215813)	LP705	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 5.15 welcome this paragraph	Support noted
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Vision for North Norfolk: Add historic Environment, scheduled monuments and registered parks and gardens to paragraph three	Noted- consider amendment to paragraph 3 of the Vision for North Norfolk in the preparation of the Vision.
Vision & Aims	Historic England (1215813)	LP705	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 6.3 change un-designated to non-designated in line with the NPPF	Noted- consider amendment to paragraph 6.3 in the preparation of the Aims and Objectives.
Vision & Aims	Norfolk Wildlife Trust (1217447)	LP689	Support	Climate change will result in significant impacts on our native wildlife, in combination with existing pressures from habitat loss and fragmentation. It is important that the plan takes every opportunity to provide for measurable net gains in biodiversity from all new development and contributes to the restoration of landscape scale ecological	Support welcome

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				networks. Provision of green infrastructure can help contribute significantly to this by restoring and creating new ecological corridors between existing wildlife sites, providing opportunities for wildlife to use it to adapt to the changing climate. It is also important to recognise that natural habitats provide important ecosystem services which can contribute to climate change mitigation. The restoration and provision of new habitats, located appropriately, can help sequester carbon emissions. When considering the reduction of emissions from new development, we recommend that the provision of natural climate solutions are seriously considered. We support the statement in 5.2 that 'measures need to be taken to enable wildlife to adapt to future changes' and recommend the role of habitat restoration and creation is considering in climate change mitigation.	
Vision & Aims	Norfolk Wildlife Trust (1217447)	LP690	Support	We welcome the inclusion of biodiversity net gain as an objective of the plan. Support the protection and enhancement of the natural environment as an objective of the plan.	Support welcome
Vision & Aims	RSPB (1217391)	LP381	General Comments	The RSPB is pleased to see reference to maintain the District's natural environment. However, there is no specific mention of the protected areas that need to remain important for the wildlife and habitats they support. There should also be mention of enhancing protected areas and important sites for wildlife, rather than simply maintaining them. This would be more in line with the NPPF requirements. Proposed changes: In addition to the AONB, make reference to Natura 2000 and SSSIs which are important for species and habitats, and mention that they will be maintained and enhanced.	Noted- Consider proposed amendments to the vision to include Natura 2000 sites and SSSIs which are important for species and habitats.
Vision & Aims	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP358	Support	Blue Sky Leisure successfully operates a number of tourism related businesses in Norfolk, including lodge, caravan and camping parks at Kelling Heath and at Woodhill, East Runton in North Norfolk district. The business is a significant local employer in the tourist and leisure sector, and employs around 125 people (including seasonal employment) in North Norfolk alone. During 2018, the business welcomed 50,000 staying visitors across its letting accommodation and touring & camping sites (excluding all privately owned holiday homes). These visitors contributed significantly to the local economy. Blue Sky Leisure therefore has a considerable stake in the Local Plan, and in particularly the application of its policies related to economy, tourism, tourism accommodation and coastal erosion. Blue Sky Leisure is pleased to be given the opportunity to comment on the First Draft Local Plan (The Plan). Blue Sky Leisure supports the Plan's acknowledgement (section 5.6-5.7), that North Norfolk's economy is dominated by tourism and the service sector; and that the economic prosperity of North Norfolk is irrevocably linked to the success of the tourism sector. The Council's own evidence suggests that almost 30% of the District's employment is in the Tourism sector which employs over 8,000 full time employees (equivalent) (Economic Impact of Tourism in North Norfolk, 2017). However, Blue Sky Leisure considers that the Plan somewhat underplays the importance that tourism and tourist accommodation	Noted- consider amendments to the Local Plan Issues section 'strengthening the local economy' and adding an additional sentence to the North Norfolk Vision along the lines of 'coastal communities and businesses affected by coastal erosion and flooding will have been supported by positive planning policies and decisions to enable their adaptation and relocation where necessary to become more resilient to coastal change.'

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

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Page 600				<p>than visitors in other types of accommodation. Without a thriving caravan and camping park sector, the North Norfolk economy will be significantly compromised. Overnight visitors need accommodation options, and expectations continue to increase. Those choosing to stay in holiday parks and camping sites generally want up to date modern facilities, many want to be as close to the coast as possible, with easy access to the attractions it offers. The sector needs to respond accordingly, and needs the Council's support to do so. Blue Sky Leisure, hope that the Council can be more supportive of the holiday park, caravanning and camping sector, through more supportive planning policies and decisions. The emerging Plan as drafted could be far more positive in its support for such businesses. Proposed change: For instance: Blue Sky Leisure, suggests that the Council considers acknowledging more explicitly in the Plan's issues section: 'Strengthening the Local Economy,' the particular challenges that coastal erosion has on the district's tourism industry, particularly in terms of tourist accommodation, and the inevitable need to allow the 'roll back' of coastal tourist accommodation sites to areas less affected by erosion. If the Council is sincere about supporting the continuation of businesses threatened by Coastal Erosion, then the Plan needs to be helpful and proactive in its approach, particularly with regards to environmental enhancement, and understand that relocation is in itself a very costly process. The burden of additional costs or restrictions on existing enterprises may realistically make relocation unviable. The Plan should be more forthright in the need to encourage and support such tourism business. Blue Sky Leisure suggests that the Council consider adding an additional sentence to the Plan's Vision for North Norfolk along the lines of "...Coastal communities and business affected by coastal erosion and flooding will have been supported by positive planning policies and decisions to enable their adaptation and relocation where necessary to become more resilient to coastal change."</p>		
	Vision & Aims	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP360	Object	<p>Blue Sky Leisure considers that the Delivering Sustainable Development objective (section 6.2), should be expanded to include provisions for the replacement of businesses at risks from coastal erosion and flooding, not just buildings. Proposed change: For instance text along the lines of "...Managing and adapting to the impacts of coastal erosion and flooding by restricting development in areas where it would expose people and property to risks and facilitating the replacement and relocation of buildings and businesses at risk..."</p>	Noted - consider amending text within Section 6.2
	Vision & Aims	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP361	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Blue Sky Leisure considers that the Enabling Economic Growth objective (section 6.5) should be expanded to express support for business affected by coastal erosions and flooding. Proposed change: "... Promoting and supporting economic growth, diversifying and broadening the economic base of the District, enabling inward investment and supporting the growth of existing businesses, and including those affected by coastal erosion and flooding".</p>	Noted - consider amending the text within Section 6.5 to express support for business affected by coastal erosion and flooding.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Vision & Aims	Natural England (1215824)	LP706, 707	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Key Visions and Issues Natural England welcome key visions to maintain the natural environment and improve and/or enhance access to green space. The Plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Aims and Objectives We strongly support the objective to provide biodiversity net gain, including the enhancement of Green Infrastructure (GI) and ecological corridors. We recommend additional wording under protecting character as detailed in table 2 (page 35) of the HRA. We advise that the Planning Authority develops an evidence base for net gain so that biodiversity gains and losses can be calculated. The mechanism of delivery should also be considered including the application of a metric to secure a net gain of biodiversity. Further advice is provided below under Policy ENV 4.	Supported noted: Consider comments in the development of future iteration of the Plan
Vision & Aims	Norfolk County Council: Historic Environment (931093)	LP739	Support	Para 5.15 To be consistent with other parts of the Plan and the Sustainability Appraisal, this paragraph needs to reference the important contribution that non-designated heritage assets make to the character of the District.	Noted:- Consider comments in the finalisation of the policy
Vision & Aims	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP469	Support	We support the vision for North Norfolk and its aims and objectives. We strongly support enhancing and maintaining the unique qualities and character of the landscape and also the provision of net gains for biodiversity. We would like to add that these net gains include Green Infrastructure and ecological corridors and are strategically considered across Local Authority boundaries. We strongly support plans for work to aid understanding of, mitigation of and adaptation to climate change and coastal change and would support further strengthening this wording.	Support welcomed: Consider comments in the finalisation Plan
Vision & Aims	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP610	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports the Plan's Aims and Objectives. However, the Council may wish to consider a change to the 'Deliver Sustainable Development' objective (paragraph 6.2), to specifically acknowledge that the development of greenfield land, in the right location, can achieve sustainable development; and that not all of the District's development needs will be met on previously/already developed land. In fact, we note that only a limited amount of the District's development needs will be met on previously/already developed land. The Council may also wish to consider a change to the 'Protect the Character of North Norfolk' objective (paragraph 6.3 bullet point 4), so that it is consistent with the Plan's other design related objectives (Meeting Accommodation Needs (paragraph 6.4 bullet point 3)) and 'Encourage' high quality design, rather than 'Ensure' it. The Council may also wish to consider a change to the 'Meet Accommodation Needs' objective (paragraph 6.4) to acknowledge that accommodation needs will inevitably change over the Plan period, and that the Plan should be flexible enough to deal with changing needs without the need for a fundamental review.	Support noted. Consider comments in the development of future iteration of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Vision & Aims	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Recognises the purpose of development management policies in guiding and managing development. However, North Norfolk District Council (NNDC) should take care when formulating these policies to ensure that policy wording is not overly prescriptive, which limits innovation, and site-specific approaches to delivering high quality and locally aligned development proposals that flow from future community consultation. In accordance with the NPPF (paragraph 16d), there is the need for conciseness and clarity to ensure soundness. However, policy wording should allow for a variety of solutions, rather than prescribing one approach that might not work as well for one site as it does for another. Several policies appear convoluted and ambiguous, or attempt to re-write national policy which results in inconsistencies. In some cases, policy wording should be comprehensively reviewed and simplified, with national policy referred to, rather than rewritten. Policies should also be easy to understand and not ambiguous, in accordance with NPPF paragraph 16.	Support noted. Consider comments in the development of future iteration of the Plan
Vision & Aims	Broads Authority (321326)	LP806	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The documents seem generally well thought out and well-presented and clear. Throughout: Would prefer 'Norfolk and Suffolk Broads' or just 'Broads' Section 4: Perhaps this section can mention the Broads. Although, of course, not covered by this Local Plan, the Broads is still an asset to North Norfolk like the AONB mentioned in 4.6. We note the Broads is mentioned in the vision. What happens outside the Broads can impact on the Broads. • 5.11 to 5.15 – again, whilst acknowledging that the Broads are not part of the area covered by this Local Plan, the Broads is part of North Norfolk and are an asset and the Broads should be referred to in this section especially 5.14. We note the Broads are mentioned in the vision	Support welcomed and comments noted
Vision & Aims	Environment Agency (1217223)	LP440, LP441	General Comments	Paragraph 4.10 We welcome reference to North Norfolk's national and international designations. The section provides a broad overview and detail on the types of designations (for example SSSI, SPA and SACs is not included at this stage. The about Norfolk section could be enhanced by acknowledging the chalk streams that flow through North Norfolk such as the Rivers Wensum, Stiffkey, Glaven, Ant and Bure. There are only 200 chalk streams in the world and most of them are located in South East England. Paragraph 4.11 We welcome the inclusion of this paragraph. We would suggest that the last line of this paragraph could be enhanced by including the addition of "and sea level rise as a consequence of climate change". • Paragraph 5.2 We are pleased to see the inclusion of this section. This section should be expanded to better reflect the severity of the impacts of climate change. North Norfolk have declared a climate crisis, which will affect its residents, businesses and present challenges to the public sector. We would like to highlight the impacts of drier weather on North Norfolk's unique wetland areas and chalk streams • We would like to see an ambition to have new development that minimises consumptive water use, harvesting rainfall, re-using grey water and promoting	Noted: Consider comments in future iteration of the Plan

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

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

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

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

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

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

First Draft Local Plan (Part 1) Comments

Comments on Proposed Sites

(Submitted by Statutory Consultees & Other Organisations)

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Town & Village Proposals

DS1: Proposed Allocations

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

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

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

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

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

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Proposals for Cromer

DS2: Land at Cromer High Station

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

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

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

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

DS3: Land at Runton Road / Clifton Park

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS3	C10/1	Anglian Water (1217129)	LP383	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Policy DS3 refers to applicants being required to provide an appropriate site layout which minimises the odour and site disturbance from Cromer Water Recycling Centre. There is a risk that odour and amenity issues could arise leading to restrictions on the continued use of Anglian Water's existing water recycling infrastructure. From the information that we have relating to this site it appears that a significant part of the site is at risk from odour from the normal operation of Cromer Water Recycling Centre. As such we would recommend a detailed odour risk assessment be undertaken for this site before it is allocated for housing as proposed. Policy DS3 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. To be effective it is suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS3	C10/1	Environment Agency (1217223)	LP478	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.	Support noted
DS3	C10/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS3	C10/1	Norfolk County Council: Children's Services (931093)	LP739	Support	<p>In order to accommodate expected children from new proposed housing in Cromer of around 900 dwellings (total growth 2016 – 2036), Children's Services using its pupil multiplier have calculated that up to an additional 1 form of entry may be required within the primary sector of the Town over the Plan period (up to 2036). The proposed development at Clifton Park/Runton Road with the "offer" of a 2ha site gives Children's Services the opportunity to consider its policy preference of all-through primary school provision for the Town of Cromer. The serviced site will need to have provision for pre-school facilities if required for the local area. A future strategy for Cromer could be 2 x 2FE primary schools to enable families in Cromer to have a choice either to the north or south of the Town. At this stage it is beneficial to secure a site early in the Local Plan process to enable Children's Services to assess/review primary education delivery in Cromer. Notwithstanding the above comments, there are uncertainties as to how in practice the offer of a primary school could be delivered both in terms of:</p> <ul style="list-style-type: none"> a. Securing adequate finance through developer contributions for the school site and its build; and b. Planned in a timely i.e. site is available / could be released at the appropriate time. <p>These issues will need to be resolved ahead of the County Council being able to fully commit to supporting the above site. County Council Officers will be progressing these issues with North Norfolk DC through the Local Plan process. Therefore while the County Council can support the safeguarding of a potential school site they cannot as yet commit to building a new school for the above reasons.</p>	Noted. Clarification welcomed. The Council has used current evidence base and engaged with relevant bodies including Children's services to identify where additional supporting infrastructure may be required as a result of new development and it is recognised that there is a requirement for further ongoing dialogue to support any final policy position. Consider comments in the finalisation of this policy
DS3	C10/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <ul style="list-style-type: none"> a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list. b) The policy should use the appropriate wording from the list below 	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

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

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 622					<p>important in this regard as these habitats offer both safe nesting habitat and foraging opportunity in the open areas of grassland. Although until around 20 years ago the site was under arable cultivation, the very light sandy soils leach nutrients rapidly, and the site now supports areas of the Acid Grassland BAP (Sch41) Priority Habitat, supporting species such as sheeps sorrel <i>Rumex acetosella</i>, wavy hair-grass <i>Aira caryophyllea</i> (an axiophyte of local conservation interest) and lesser hawkbit <i>Leontodon saxatilis</i>, along with areas of more circumneutral grassland supporting yellow oat-grass <i>Trisetum flavescens</i> and rest-harrow <i>Ononis repens</i>. The more open and disturbed areas of grassland, particularly in the southern part of the site support a plethora of 'rare' and declining species of annual clovers including hare's-foot clover <i>Trifolium arvense</i>, knotted clover <i>Trifolium striatum</i> and clustered clover <i>Trifolium glomeratum</i> (a nationally scarce species), with the population of these numbering in the thousands rather than hundreds. The more open grassland habitats are also notable for supporting hundreds of plants of common cudweed, <i>Filago vulgaris</i>, a species which is considered Near-Threatened nationally and which is a species of conservation concern in Norfolk. There is also potential for plant species such as <i>Ornithopus purpusillus</i>, <i>Cerastium arvense</i>, and <i>Cerastium semidecandrum</i> to be present, these having been recorded in similar habitats in the immediate local area. As with loss of habitat used by breeding and landfalling bird species, it would not be possible to mitigate for development impacts upon the grassland habitats nor upon the uncommon species they support. We consider that Mill Lane, that bisects the site E-W is likely to be an important bat flyway and may be used by local bat populations seeking to access sheltered foraging in the lee of the coastal cliffs. The railway line to the south should be regarded as a key wildlife corridor. We consider that the site is also very likely to support common species of reptiles. It would not be possible to mitigate for the loss of the important habitats and loss of species interest should the site be formally allocated for development. Should NNDC wish to see site notes, species lists etc. then these could be provided on request.</p>	Mitigation measures will be a requirement to offset any potential adverse impact.
	DS3	C10/1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP607	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This site allocation incorporates the provision of serviced land for a new two form-entry primary school which has been identified by the Education Authority and justification is set out in the IFS. The policy rightly does not specify the location of the proposed school within the allocation. However, the delivery of the school site has been the subject of extensive discussions with the</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 623					<p>Education Authority and the position of the school site as shown on the Concept Masterplan, which accompanies these representations, has been agreed with NCC(Education). The site fronts onto Runton Road to the north with good vehicular access options. The site is located adjacent to existing built form at Clifton Park to the east and therefore forms a natural extension to Cromer forming an important gateway into the town. It is therefore appropriate that its development is carried out sensitively to ensure the creation of a high quality gateway to the west of Cromer and this will be achieved through the provision of public open space along the site frontage which will include SUDS ponds and landscaping to create a green gateway to the site with buildings set-back from the A149. On this basis we support Part 1 of the site-specific requirements (i.e. careful attention to site layout, building heights and materials in order to minimise visual impact), which is reflected in the Concept Masterplan, which forms part of this submission. The site is allocated for a mix of uses comprising approximately 90 new homes as well as land for significant community infrastructure in the form of the primary school land and public open space. The requirement for the primary school land is accommodated within the accompanying Concept Masterplan, which includes a 2.2 ha site for a two form-entry primary school, with space for a pre-school should this be required in the future, and a further 0.4 ha of land for possible future expansion of the primary school in order to future proof the school site (further details are provided in the accompanying Delivery Statement). As stated above, the scheme will provide public open space (incorporating SUDS features and landscaping) along the site frontage to create a high quality green gateway to the town, with buildings set-back from the A149 thereby addressing the requirement under Part 2 of the draft policy to retain an open frontage to the site. As such we support Part 2 of the policy, provided there is adequate flexibility in the requirements of the policy to ensure that all aspects of the scheme can be delivered without compromising the quality and form of development. As such the Council may wish to consider a minor amendment to the draft policy to clarify this. The requirement set out in Part 3 relates to setting out the development in the most appropriate manner to mitigate impacts from the adjacent railway line and water recycling centre. These features have been considered as part of the preparation of the Concept Masterplan and do not represent a constraint to delivery of the scheme. Further information is provided in the accompanying Delivery Statement and Phase 1 Desk Study</p>	

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					enhancements will be secured in accordance with Anglian Water's standard charging regime. "	
DS3	C10/1	Suffield Park Infant & Nursery School, Mrs Nichola Stewart (1218488)	LP792	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Concerns over the planned school on Runton Rd are follows: <ul style="list-style-type: none"> • Previous housing development has not led to increased numbers of primary school children as most of these houses have not been affordable for families. For example there are currently no children attending school from the Roughton Rd development. Some are used as holiday homes. • The school's current capacity is for three form entry with a pupil admission number in each year of 90. This is mirrored in Cromer Junior School. • At present there are only 60 children in each year group and this is the projected figure for the next three years, therefore building another school would potentially make all three schools unsustainable. • It appears part of the reason for families not residing in these new developments is the lack of well-paid employment opportunities locally • The cost of transport to employment elsewhere is prohibitive therefore making it unaffordable to reside in Cromer 	Noted. Consider comments in the development of the policy. The Council has used current evidence base and engaged with relevant bodies including Children's services to identify where additional supporting infrastructure may be required as a result of new development and it is recognised that there is a requirement for further ongoing dialogue to support any final policy position.

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

DS4: Former Golf Practice Ground

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS4	C16	Anglian Water (1217129)	LP386	Support	Policy DS4 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage should be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Noted: Consider comments in the development of the policy.
DS4	C16	Environment Agency (1217223)	LP478	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.	Support noted
DS4	C16	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS4	C16	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 627					<p>avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity,</p>	

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

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

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

DS5: Land West of Pine Tree Farm

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS5	C22/1	Anglian Water (1217129)	LP429	Support	Policy DS5 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS5	C22/1	Environment Agency (1217223)	LP478	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • Paragraph 12.9 We have no concerns for West Runton Water Recycling Centre (WRC). We welcome that the plan acknowledges the need for upgrades to waste water infrastructure where required.	Support noted
DS5	C22/1	Natural England (1215824)	LP726	General Comments	NE is very concerned about allocation C22/1 and recently objected to this proposal (note site is subject to a separate planning application, NNDC added) (our ref: 279055, dated 22nd May 2019) on the following grounds: · The proposed development will significantly impact the special qualities of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) · The proposal is contrary to local Plan policy, fails to pass the exceptional circumstances text of the NPPF (para 172) and does not support the objectives set out in the AONB Management Plan Natural England have strong reservations about the sustainability of the proposal and creeping urbanisation into a protected landscape.	Comments noted: The site is subject to a separate planning application ahead of any allocation. Landscape and settlement considerations including the potential impact of development on landscape and views, along with a site specific SA have all informed site selections. Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. A separate SA has also been published
DS5	C22/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any	Noted:- Consider comments in the finalisation of the policy

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

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

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

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

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

Proposals for Fakenham

DS6: Land North of Rudham Stile Lane

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 636					<p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
	DS6	F01/B	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP628	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This site includes a proportion of land controlled by Trinity College suitable for the provision of up to circa 400 dwellings (incorporating other complementary uses as appropriate), as indicated in their response to the Call for Sites in 2016. Vehicular, pedestrian and cycle access to this land is proposed via a link road from the adjacent site (Site F01/A) that forms part of the current outline application for that development. The area of land within Trinity College's control is contained between the A148 to the north, Rudham Stile Lane to</p>

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					planning application process, in order to ensure that it reflects the relevant development context and in order to maximise the long-term development prospects for the site and, therefore, the prospect of meeting the needs of the town overall. On this basis, Trinity College proposes that further detailed consideration needs to be given to the potential scope of development across the site, and that this should inform the final wording of the policy to secure development of allocated land in the most effective and efficient manner.	
DS6	F01/B	Shell Ltd (Mr Daniel Olliffe, CBRE) (1216247 1216246)	LP212	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Land North of Rudham Stile Lane is an extension to an existing strategic allocation, which as acknowledged at Paragraph 13.16 of the Plan has been allocated but not developed. Given the site is subject to a number of constraints (Utilities, archaeology, infrastructure) and development is dependent upon firstly the development of the existing strategic allocation and secondly a number of significant and key infrastructure improvements, the deliverability of the site within the Plan period is questioned. Whilst suitable and available, it is not considered that the plan has appropriately assessed the deliverability of the site and potential timescales for this delivery. In simple terms, the need for the existing strategic development to come forward in advance of this site and given the need for significant infrastructure to facilitate development, it is not considered that the full 560 dwellings, as allocated, will come forward over the Plan period.	Noted. Sites have been assessed against a detailed set of criteria and have been subject to a process of Sustainability Appraisal. The decision on whether a site should be proposed as a draft allocation is made having regard to all of the factors set out in para 11.10 of the emerging LP and detailed in Background Paper 6 - Development Site Selection methodology. Comments noted on deliverability and will be addressed in the next iterations of the plan.
DS6	F01/B	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP627	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Trinity College is progressing proposals for the development of land north of Rudham Stile Lane (Site Allocation F01/A) through an outline planning application. It is anticipated that this will be determined later this year and will bring forward the comprehensive development of the site to provide residential and employment development, alongside a new primary school and local retail and community facilities. Those proposals have been prepared to reflect the parameters set out within the approved Development Brief for the site. As such, planning permission is anticipated in 2019, rather than 2020 as noted in the draft supporting text. Given the approach to developer contributions and viability in order to secure site specific contributions to manage and mitigate the impact of development (reinforced in the draft Local Plan under Policy SD 5), alongside the standard mechanisms of the development control process, all applications for development must	Noted. Consider comments in the development of the policy.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					demonstrate how they will deliver the infrastructure to support the scale of development proposed. As such, paragraph 3.19 inappropriately refers to the potential delaying of development associated with Site F01/A if key infrastructure and facilities are not available. As securing the delivery of the necessary infrastructure is a fundamental prerequisite of the decision making process, this reference is unnecessary and it is proposed that the final sentence of paragraph 3.19 should be removed.	

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

DS7: Land at Junction of A148 & B1146

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS7	F03	Anglian Water (1217129)	LP391	Support	Policy DS7 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS7	F03	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	Many of the draft allocations for housing and employment contained within the Plan are underlain to a greater or less degree by safeguarded mineral resources, namely sand and gravel. A small number of the draft allocations for housing or employment are within the consultation areas of existing mineral extraction sites, existing waste management facilities, existing Wastewater Recycling Centres, and/or Mineral Site-Specific Allocations within the adopted mineral Local Plan. Many of the draft allocations for housing and employment contained within the Plan are underlain to a greater or less degree by safeguarded mineral resources, namely sand and gravel. A small number of the draft allocations for housing or employment are within the consultation areas of existing mineral extraction sites, existing waste management facilities, existing Wastewater Recycling Centres, and/or Mineral Site-Specific Allocations within the adopted mineral Local Plan. The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS7	F03	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions.	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

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

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 643					<p>be included in their programme of works. The landowner understands there is currently sewer capacity to accommodate development of the site. Also, the inclusion of this point is therefore questioned as a result of the Barratt Homes vs Welsh Water Court Supreme Judgement which confirmed that developers have the right to connect into the existing sewer system at the point of their choice, without liability for costs beyond the cost of the physical connection. This should not be listed as a constraint but a note to Anglian Water. Ecological/biodiversity constraints are not mentioned in the supporting text to Policy DS7. However, appropriate landscaping would be part of the scheme to enhance the biodiversity credentials of the development.</p> <p>The following wording is suggested for consideration "Land amounting to approximately 2.2 hectares will be allocated for development comprising approximately 65 dwellings inclusive of affordable homes, public open space, and associated on and off-site infrastructure set out below. Development proposals would need to comply with a number of policies elsewhere in this Plan and the following site specific requirements: - An appropriate design solution should be provided to address the boundaries between the development and the A148; - Provision of highway access on to Toll Bar; and</p>	
	F03	Shell Ltd (Mr Daniel Olliffe, CBRE) (1216247 1216246)	LP213	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The principle of the allocation of Land at Junction of A148 and B1146 is supported and the growth to the west of Fakenham is considered to be an appropriate location for future development within the village. However, it is noted that site specific requirements for development included the need to provided highway access on to Toll Bar. This allocation, caveated on the ability to provide a suitable access, calls into question the soundness of the Plan and the appropriateness of assessment of alternative sites, specifically Land at Creake Road (Ref F02) which is dismissed as not being appropriate due to unsatisfactory access. This is simply not true. Land at Creake Road can be safely and appropriately accessed. The soundness of the Plan and allocations within Fakenham is therefore questioned as there is no differentiation between this allocation and Land at Creake Road, which can be appropriately accessed and could be conditioned in the same way with respect to access. It is considered that the assessment of alternative sites should be revisited and appropriate amendments to the allocations within the Plan made, namely the inclusion of Land Rear of the Shell Garage, Creake Road.</p>	Support for this proposal noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan.

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

DRAFT

DS8: Land South of Barons Close

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 646					<p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures</p>	

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 648					<p>damaging impact on wildlife. Fakenham attracts an increasing number of tourists to the Town and area on the basis of its association with the Wensum Valley. The Town is close to the Hawk and Owl Trust reserve at Sculthorpe which is a large, and now nationally important wildlife reserve, together with the equally important reserve and attraction of Pensthorpe Natural Park to the south of the Town. Large numbers of persons stay in the area - notably on the Racecourse and in other accommodation in the Town - and are attracted by these two reserves and the habitats and landscapes that are on the doorstep of where they are staying - with public footway access along the Wensum Valley to birdwatch etc. from just a few metres away which will be directly impacted by views of and biodiversity impacts from the proposed development. The damaging effects of the proposed development of area F10 will have an impact on the conservation biodiversity interest of the valley and will impact on these two major reserves together with the wider habitats and landscapes that people visiting the area come to see and experience. The development will therefore adversely impact on the tourism value of the Town and area. The erosion of the semi-natural habitat of the valley will also significantly adversely impact on the landscape character of the Town and Valley. The site is within a key accessible area of the Town and Valley by public right of way - there is a PRoW which runs the full length of the northern boundary of the site and which gives views over the pasture and woodlands to the south. The current character of this area is one of peaceful semi-natural habitats - a rare character type in Norfolk and also rare for the public to be able to access these easily from public rights of way. The development as proposed will effectively remove this value from the footpath on the northern side of the site and also impact significantly into views and the experience of the character of the valley from the well used bridleway alongside the River Wensum adjacent to the 'open space' element to the site. Landscaping as suggested in the text would not compensate for or significantly mitigate the impact of this experience for the persons using the Rights of Way and the impact on damaging the Character of the Town and area would be significant and contrary to policy ENV 2 within the Local Plan Overall, FACT believe that the site does not represent a sustainable or appropriate location for development. We are deeply concerned about the potential harm to the special features of biodiversity value within the Wensum Valley and impacts on the River Wensum SAC and nearby sites of the Hawk and Owl Trust reserve and Pensthorpe. We consider that there will</p>	

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

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

Proposals for Holt

DS9: Land South of Beresford Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS9	H04	Environment Agency (1217223)	LP481	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS9	H04	Natural England (1215824)	LP727	General Comments	Policy DS 9 We agree with policy wording amendments in section 9.7 of the HRA for allocations HO4, H27/1.	Support noted. The HRA will inform further development of the proposal
DS9	H04	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS9	H04	Gladman Developments, Mr Craig Barnes (1217131)	LP287	Support	Gladman welcome and wholly support the proposed allocation of Land South of Beresford Road, Holt for housing through the Local Plan. Holt is a sustainable settlement, as illustrated by its inclusion as a Small Growth Town in the settlement hierarchy (see Policy SD3). It is therefore a suitable location for development over the plan period. The limited constraints to development within the town (in comparison to other settlements in this tier), together with the important role played to a wider rural hinterland, provides justification for a higher level of development to be accommodated at the town over the plan period. Land South of Beresford Road provides a sustainable and suitable option at which to meet some of this housing need. The Site is located to the south of the settlement, sandwiched between the existing built form and the Holt Country Park. The Site therefore serves a	Support noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>minor role within the countryside and the impact of developing the site on the wider landscape is very limited. The location of the Site reflects well and respects the built form of Holt and is responsive to the constraints of the settlement. To the north of the town is the Norfolk Coast AONB and as a result, applying the requirements of the NPPF, major development is restricted unless to have demonstrated public interest. The location of the Site avoids this constraint and is not located within the setting of the AONB. The Site has been selected by the Council as a draft allocation for housing following a vigorous and well-balanced selection exercise as summarised in the Site Selection Methodology background paper. The Site is assessed as reference H04. The assessment indicates that the Site is capable of accommodating 100 to 120 dwellings (as well as a 2FE school), is evaluated to be well located to the town centre and services, experiences no significant environmental constraints, and is not subject no contamination or flood risk. The Site scores positively in the Sustainability Appraisal and considered by the Council to represent one of the most sustainable and suitable locations of the sites examined in Holt. As well as responding to the housing needs of Holt and the wider local area, the allocation of the Site provides the Council with several additional opportunities. The Site will (and Gladman is committed to the delivery of) provide a serviced site for a new 2FE primary school (on the LEA's preferred site) which will in part address pre-existing education capacity problems within the town, as well as accommodate the schooling needs of the local population for the plan period. The Site provides the opportunity to better connect the settlement with the Holt Country Park to the south encouraging its use and enhancing access to recreation for existing residents. As Site promotor, Gladman can confirm the availability and deliverability of the Site for housing. Gladman promotes land on a nationwide basis, with a strong record of delivering new homes on the sites it promotes. Gladman has submitted an outline planning application for the development of the Site for housing, as well as land for a new 2FE primary school, public open space, landscaping, drainage and access (see Planning Application PO/18/1857). The application confirms Gladman's commitment to secure the development of the Site. Determination of the planning application by the LPA is likely to be in July 2019. Gladman consider that the Site can be developed in the short term. Submission of the application now, together with limited constraints means that the is no reason why the site could not contribute towards years 4 and 5 of the five-year supply, with the</p>	

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					that at this time, this policy requirement is sufficiently justified. Proposed changes: To reflect the evidence produced in support of the planning application, as well as the amount of development promoted through the planning application by Gladman, Gladman request that the policy is amended to read “around 110 dwellings”. To provide flexibility, should the LEA determine that an alternative site is better suited to accommodate a new primary school, the Policy should acknowledge that the Site is suitable to accommodate housing in its entirety, where this is accepted and acknowledged by the Council. Should further discussions with Anglian Water confirm the need for these works, Gladman request clarification through the Infrastructure Delivery Plan, of the extent, cost and timescales required for this infrastructure. This information would provide clarity for decision makers, applicants and the community alike. It would also alleviate the potential for delay during the application process.	
DS9	H04	Historic England (1215813)	LP705	Object	<p>Whilst there are no designated heritage assets on site, this site lies immediately to the north of the Glaven Valley Conservation Area and Holt Country Park. Any development of this site therefore has the potential to affect the setting of the Conservation Area.</p> <p>We welcome the reference to the Conservation Area in paragraph 14.20. However, no mention is made of the Conservation Area in policy DS9. We note that criterion 3 of policy DS9 does make provision for 1.4 ha of public open space including a landscape buffer to Holt Country Park. We suggest that this criterion is amended to make reference to preserving and enhancing the setting of the Glaven Valley Conservation Area.</p>	Consider amendment to criterion 3 to read: Provision of 1.4 hectares of public open space to include a landscape buffer to preserve and, where opportunities arise, enhance the setting of the Glaven Valley Conservation Area and Holt Country Park.
DS9	H04	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word ‘including’ this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

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

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

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

DS10: Land North of Valley Lane

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					listed buildings and to provide greater protection for the conservation areas in line with the statutory wording.	
DS10	H17	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

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

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

DS11: Land at Heath Farm

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS11	H20	Anglian Water (1217129)	LP397	Support	Existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is suggested that the following wording be added to Policy DS11: That suitable access is safeguarded for the maintenance of water supply infrastructure.	Support noted: Consider comments in the development of the policy.
DS11	H20	Environment Agency (1217223)	LP481	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS11	H20	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS11	H20	North Norfolk Tomatoes (Mr David Fletcher, Strutt & Parker) (1217432)	LP537	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk Tomatoes support the allocation of Site H20: Land at Heath Farm, as set out in policy DS11 for residential development of approximately 200 dwellings. Norfolk Tomatoes supports the inclusion of Holt as a Small Growth Town and considers it is the most sustainable of the five settlements designated as 'Small Growth Towns'. It attracts employment, having higher employment	Support noted.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					within the area, and a strong retail offering, which complements Sheringham and Cromer.	
DS11	H20	Historic England (1215813)	LP705	Object	<p>Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the south east of the site. Development has the potential to impact upon the setting of these listed buildings.</p> <p>We welcome the reference to these listed buildings in paragraph 14.32 and policy DS11 although the text should be amended to read south east rather than north east.</p> <p>The policy should be re-worded for greater consistency with the legislation and to make the policy more robust.</p>	<p>Noted- consider amendment to Paragraph 14.32 and Policy DS11 to read 'listed buildings to the south east of the site'. Consider re-wording policy DS11 to read: A site layout and landscaping scheme to preserve the significance of the listed building to the south east of the site.</p>
DS11	H20	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and</p>	<p>Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 661					<p>Conservation Areas) Act 1990. registered park and garden - 'Development should protect the registered park and garden and its setting.' scheduled monument 'Development should protect the scheduled monument and its setting.' combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014 Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible. There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc. Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions. By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
	DS11	H20	Norfolk Land Ltd, Mr A Presslee (1216618 1216614)	LP377	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is notable that the H20 (Land at Heath Farm) site was a late addition to the draft Plan, arising from amendments to Government methodology and guidance and the necessity to increase planned housing numbers (ref. North Norfolk Council's Planning Policy and Built Heritage Working Party papers of 02 November 2018). It is a large site (an extension to an allocation in the current Core Strategy, and contributing to contributing – at approximately 200 houses – nearly two thirds of Holt's provision), and its sustainability appraisal (environmental score) was 'negative'. It is some distance from, and not readily accessible to, the town centre, and there will be a high probability of reliance upon the car for everyday movements. It is our contention that rather than look to allocate a site that is evidently unsustainable in the terms of its certain environmental impacts, and its distance from the rest of the town and its facilities/services (simply to 'make up the numbers' and in a</p>

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

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

DS12: Land at Heath Farm (Employment)

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS12	H27/1	Environment Agency (1217223)	LP481	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We have not fully checked for constraints at every site allocation within the Local Plan. However, we have included brief comments in the relevant sections. Where policies reference enhancements to sewerage infrastructure, the wording should ensure that enhancement to sewerage infrastructure is undertaken ahead of occupation of dwellings, this is to prevent detriment to the environment and comply with WFD obligations. • We understand that Holt WRC is close to capacity so an upgrade will be needed soon. This will ensure sufficient treatment to protect shellfish and bathing waters. We have been working with the Norfolk Rivers Trust to investigate the feasibility of installing an integrated wetland to improve the quality of discharged water from Holt Water Recycling Centre (WRC).	Support noted
DS12	H27/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.	Noted:- Consider comments in the finalisation of the policy
DS12	H27/1	North Norfolk Tomatoes (Mr David Fletcher, Strutt & Parker) (1217432)	LP540	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk Tomatoes support the allocation of Site H27/1: Land at Heath Farm, as set out in policy DS12 for employment development. Norfolk Tomatoes supports the inclusion of Holt as a Small Growth Town and considers it is the most sustainable of the five settlements designated as 'Small Growth Towns'. It attracts employment, having higher employment within the area, and a strong retail offering, which complements Sheringham and Cromer.	Support noted.
DS12	H27/1	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets within the site, the site lies immediately adjacent to the boundary of the Glaven Valley Conservation Area. There are two grade II listed buildings to the north of the site at Heath Farm. Development of the site has the potential to impact on the settings of these heritage assets. As an employment site, the potential impact is arguably greater than for a residential site. We note there is no reference to the historic environment in the site	Noted - Consider amending the policy to make reference to the listed buildings and the Conservation Area in order to conserve and where appropriate enhance the listed buildings at Heath Farm and the Glaven Valley Conservation Area and their settings. Consider amending paragraph 14.35 to

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>assessment on p60, Appendix B of Background Paper 6 – Development Site Selection Methodology, which is surprising given the nearby heritage assets and potential impact on settings.</p> <p>Given the proximity of the Conservation Area, Historic England has concerns regarding this site. Any development would need to be sensitively designed with appropriate landscaping.</p> <p>We welcome the reference to the listed buildings in paragraph 14.39. However there is no mention of the listed building in the policy. The policy should be amended to include reference to the listed buildings.</p> <p>The only mention of the Conservation Area is at paragraph 14.35 and whilst it is true that the site is not within the Conservation Area, no mention is made of the fact that it is immediately adjacent to the Conservation Area, which is an important omission. Paragraph 14.35 should be amended to more accurately reflect the relationship of the site to the Conservation Area. The policy should also be amended to include reference to the Conservation area.</p>	state that the conservation Area lies immediately adjacent to the site.
S12	H27/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 665					<p>(3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990. conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
	DS12	H27/1	Norfolk Wildlife Trust (1217447)	LP697	Object	<p>We regard this as an inappropriate site for employment development, due to its proximity to the Norfolk Valley Fens SAC and the presence of alternative potential employment land in Holt in the draft plan . We believe there is a likelihood of an adverse effect on the SAC due to the proximity and land use, and so object to the proposal in this location. We recommend that if further employment land is required in Holt, that it is situated instead as part of proposed site H20, which would also benefit from existing transport links. Should the Council wish to proceed with an employment land allocation here, then it would need to be considered carefully as part of the plan HRA process before being progressed further in order to demonstrate that this</p>

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					allocation is deliverable. Proposed changes: Removal of this site from the plan.	

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

Proposals for Hoveton

DS13: Land East of Tunstead Road

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS13	HV01/B	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS13	HV01/B	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP159	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Persimmon Homes (Anglia) support the Plan's identification of Hoveton as a settlement capable of accommodating growth. Persimmon Homes (Anglia) are promoting land for development in Hoveton. The land is proposed to be allocated for residential development in the dlp ref: HV01/B Land East of Tunstead, Policy DS13.	Support noted.
DS13	HV01/B	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP160	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Persimmon Homes (Anglia) are promoting land for development in Hoveton. The land is allocated for residential development in the DLP ref: HV01/B Land East of Tunstead, Policy DS13. The site allocation suggests that it is capable of accommodating approximately 150 homes, including affordable dwellings, elderly accommodation and infrastructure. Persimmon Homes (Anglia) have some comments on the wording of Policy DS 13. They are not considered fundamental to the Policy's soundness, which is not questioned, rather they are intended as adding clarity and certainty to the policy. 1. Suggest that the policy should be worded to require 'at least' 150 dwellings rather than 'approximately' 150 dwellings as it has carried out some technical work for the site in the form of a draft Planning Layout (submitted) that demonstrates delivery of 150 dwellings, including affordable housing, and a 1ha serviced site for the development of accommodation for the elderly to provide up to 75 beds of accommodation. In light of this technical work it can be demonstrated with evidence that there are no technical constraints to the site's development that cannot be overcome through careful design and/or with appropriate mitigation, if necessary; 2. Suggest that the policy acknowledges that not all hedgerows can be retained on site, as some will need to be removed to provide the access and visibility splays onto Tunstead Road;	Support noted for Policy DS13. 1. Disagree. It is considered that the wording of 'approximately 150 dwellings' gives the appropriate flexibility in terms of the residential allocation. 2. Disagree, the retention of trees and hedgerows should be a consideration from the outset. 3. Affordable housing needs to be provided across all types and tenure of accommodation.

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 670					<p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

Proposals for North Walsham

DS14: Land at Norwich Road & Nursery Drive

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS14	NW01/B	Anglian Water (1217129)	LP398	Support	There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Amend policy DS14 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that the following wording be added to Policy DS14: '9. That suitable access is safeguarded for the maintenance of water supply infrastructure.'	Support noted: Consider comments in the development of the policy.
DS14	NW01/B	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS14	NW01/B	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP545	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Persimmon Homes (Anglia) supports the allocation of the Mixed Use: Land at Norwich Road and Nursery Drive (Site Reference NW01/B (including NW05, NW06/1 (part), NW07, NW30) Policy DS14, but suggests the following minor amendments to the wording of the policy for clarification and flexibility in applying the policy when drawing up more detailed proposals for the Development Brief: 1. Wording of Proposal on page 229 to be amended to remove “and enhancement” and to add the word “approximately” in two places. The wording (as amended) should read as follows: “Proposal - Mixed-use allocation including residential development of approximately 350 dwellings, the retention of approximately 2 hectares of existing employment land and provision of approximately 3 hectares of public open space.” 2. Wording of Policy DS 14 on page 230 to be amended to remove “and	Noted: Consider comments in the development the policy. Proposals for North Walsham will be informed through the development of the Development Brief

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 673</p>					<p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

DRAFT

DS15: North Walsham Western Extension

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					access to the existing boreholes will be safeguarded for operational and maintenance purposes by the water undertaker.	
DS15	NW62	Natural England (1215824)	LP728	General Comments	Policy DS 15 Site allocation NW62 is of significant size and within 1km of Bryants Heath SSSI which is linked directly via a public footpath. Due to the lack of alternative green space in the area we would anticipate an increase recreational use of the designated site. To mitigate disturbance impacts, the proposal will require suitable onsite open space that is proportionate to the scale of the development and sufficient to absorb the routine recreational requirements for the anticipated number of residents (a country park or equivalent). In addition, this allocation should provide significant contributions to net gain and opportunities for habitat creation as in line with emerging Policy ENV 4. Historically, the land parcels adjacent to the site were heathland and recreation of this habitat could provide an extension and buffer to the SSSI, potentially supporting wildlife whilst integrating recreation. Natural England would welcome a conversation about net gain and GI opportunities.	Comments noted & further engagement welcomed : The policy approach includes a requirements for enhancement to public rights of way, mitigation and enhancements to Bryant's Heath SSS1 as well as a requirement for significant levels of Open space. Any final allocation will be informed by the production of a Delivery Brief / Masterplan
DS15	NW62	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS15	NW62	Norfolk County Council: Children's Services (931093)	LP739	Support	While the emerging Local Plan does not raise any immediate issues for the County Council as education provider the following point need to be made: North Walsham (Western Extension) – The County Council supports the provision of a new primary sector school as part of the proposal for 1,800 new homes to the west of North Walsham (Policy DS15).	Comments and support noted

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 678					<ul style="list-style-type: none"> • Similar conclusions were reached by a separate report by Hourigan Connolly in 2014, which demonstrates that the delivery of homes from urban extensions of 500+ units takes about 9 years from first submission of reserved matters, with over 5 years required for securing an implementable consent. • The Lichfields report demonstrates an average annual rate of 102.5 dwellings per annum for sites of 1,500-1,999 units, but this is an average across all sites considered in the report. We would contend that this average figure would be at the very upper end of what could be delivered from a single site within North Norfolk, even with multiple outlets, since the Council's Interim Statement: Five-Year Supply of Housing Land & Housing Trajectory 2018 – 2023 (published June 2018) shows no sites delivering more than 60 dwellings per annum. This indicates that any one site is unlikely to sustain more than two operating sales outlets at a given period. • Clarification is required as to the extent and rate of housing the Council are relying upon being delivered from this site within the plan period. Further evidence is required which addresses the level of infrastructure and enabling works required before any houses can be delivered, in respect of both their deliverability and viability of the scheme to deliver such works alongside the range of other policy requirements. Reference is made, for comparison, to LPP1 site at Rudham Stile Lane, Fakenham (Policy F01). The 2018 Housing Land Supply and Trajectory Interim Statement identified the first delivery of housing from this application being in 2021/22, 10 years since the allocation became part of the DP and that even from such a large site, the trajectory shows a maximum of 60 dwellings per annum being delivered. Propose alternative site - The site at Paston Gateway represents an excellent opportunity for the Council to diversify the range of sites being allocated at the District's largest town, and to de-risk its current over-reliance on a single strategic site. The deliverability of Paston Gateway is discussed in more detail below, and in the Vision Document which accompanies these representations. 	the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.
	DS15	NW62	Save Our Streets North Walsham, Mr Berni Marfleet (1217329)	LP336	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We object to the Plan as it does not properly address the Climate Emergency which both the Government and NNDC have declared. The Plan is not considered fit for the purpose it sets out to achieve and there are significant risks to delivering its objectives and targets. We believe it needs to be

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

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS15	NW62	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE</p>	<p>Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.</p>

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

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

DS16: Land at Cornish Way

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS16	E10	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.	Noted:- Consider comments in the finalisation of the policy
DS16	E10	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 684					<p>park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

Proposals for Sheringham

DS17: Land Adjoining Seaview Crescent

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

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

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

DRAFT

DS18: Former Allotments, Weybourne Road, Adjacent to Splash

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

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

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

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

DS19: Land South of Butts Lane

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 692					<p>an elevated position with a moderate fall in height from north to south, the land has residential development to the west and north boundary and a railway line to the south. Therefore, any new housing development would not result in a significant break out into the open countryside or have a negative impact upon the landscape, as there would be more elevated development to the north of the site. The proposal would allow a logical extension of the settlement boundary and could provide much-needed housing development with a care focus. With regard to heritage assets to the south of the site, these are located on the opposite side of the railway line and would not be affected by residential development. The land off Nelson Road SH16/1 is also considered more suitable for development than NNDC proposed site, on land South of Butts Lane SH18/1B. Land South of Butts Lane SH18/1B is located within an Area of Outstanding Natural Beauty and forms part of the setting of Sheringham Park and Conservation Area (see Core Strategy Proposals Map). The development of this land would have a greater impact upon an important landscape area in comparison to land off Nelson Road, which has no environmental or landscape designations. It would also result in a significant break out into the open countryside with existing development on only one boundary. The land South of Butts Lane also appears to have a constrained access and is likely to result in more ecological impacts as it would remove an agricultural land buffer between residential development and a large woodland area. Although land south of Butts Lane is considered to be well located to services and schools, the site is on the edge of Sheringham and a considerable distance from services and facilities in the town centre. Land off Nelson Road is much closer to the town centre and more sustainable. NCC would, therefore, object to site allocation Land South of Butts Lane SH18/1B and request land off Nelson Road SH16/1 be reconsidered for development</p>	
	DS19	SH18/1B	Historic England (1215813)	LP705	Object	<p>This sensitive site is located within the Upper Sheringham Conservation Area. Any development therefore has the potential to impact upon the Conservation Area. The site is also located within the defined setting of Sheringham Park.</p> <p>To that end we have some concerns about the site. We do however note the wooded setting to the south and residential development to the north. With careful design, layout and landscaping some development may be acceptable of this site.</p>

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

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

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

Proposals for Stalham

DS20: Land Adjacent Ingham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS20	ST19/A	Anglian Water (1217129)	LP412	Support	There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Amend policy DS14 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that the following wording be added to Policy DS14: '9. That suitable access is safeguarded for the maintenance of water supply infrastructure. 'Anglian Water asks that the wording relating to foul drainage be amended to ensure it is effective. suggested that wording be amended as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS20	ST19/A	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS20	ST19/A	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. To that end we make the following suggestions. a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list. b) The policy should use the appropriate wording from the list below	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

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

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

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS21	ST23/2	Anglian Water (1217129)	LP414	Support	Policy DS21 states that enhancements to the public foul sewerage network may be required based upon comments previously made by Anglian Water . However the opening sentence states that developments proposals will be required to comply with both Local Plan policies and site specific requirements. Wording relating to foul drainage be amended to ensure it is effective as follows: 'details of any required enhancement to the foul sewerage network'	Support noted: Consider comments in the development of the policy.
DS21	ST23/2	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS21	ST23/2	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	As agreed at our meeting in September please find attached additional policy wording from the LLFA for the sites discussed and suggested text for brownfield development: Ground investigations will need to prove if site is favourable for shallow infiltration as a method of discharging surface water. If infiltration is not showing to be favourable the applicant will need explore options to drain to the North East corner of the site where the makeup of the parcel of land is sandy gravels and/or whether the pond to the West could cope with the additional surface water from the development. It is not recommended that any buildings or SUDs features are to be constructed in the area of ponding in the South East corner of the site.	Noted:- Additional commentary updating previous holding objection (Lp739) from LLFA 16.10.19 . Consider comments in the finalisation of the policy
DS21	ST23/2	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets within this site, the site lies adjacent to Stalham Conservation Area. There are two grade II listed buildings, Church Farmhouse and stable block to the west of the site as well as the grade II* listed Stalham Hall and two associated grade II listed buildings (barn and Stewards House) to the east of the site. Development of the proposed allocation would mean that Church Farm is severed from the surrounding rural landscape and the historical connection between the buildings and land would be lost. Development would also impact upon the setting of the Conservation Area, Stalham Hall and other listed buildings in the area. The relationship between some parts of the historic village core	Noted- Consider deleting the site or amending paragraph 18.18 to read 'listed buildings' and bullet 5 to read 'conserve and where appropriate enhance the nearby listed buildings including Stalham Hall (grade II*) and Church Farm and the Conservation Area and their settings.

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 700					<p>Conservation Areas) Act 1990. registered park and garden - 'Development should protect the registered park and garden and its setting.' scheduled monument 'Development should protect the scheduled monument and its setting.' combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014 Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible. There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc. Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions. By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

Proposals for Wells-next-the-Sea

DS22: Land at Market Lane

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

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

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

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

DS23: Land Adjacent Holkham Road

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS23	W07/1	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS23	W07/1	Homes for Wells, Mr David Fennell (1217420)	LP547	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Homes for Wells agrees with representations that housing development on the ridge of land between Mill Road and Holkham Road would be intrusive on the landscape. Homes for Wells supports the development of the red area between Mill Road and Holkham Road, subject to its limitation to affordable housing for rent to local people, but suggests that a better alternative close by would be the abandoned allotments south of Mill Road adjoining the former railway line at the east side of Heritage House. Such a development would be on land of poor value, is no longer wanted for allotments, would be inconspicuous and is within easy reach of the town centre. Given that any greenfield site is going to attract ferocious opposition to development, Homes for Wells submits that this would in fact be one of the least contentious sites.	Comments noted: Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community. Consider alternative site proposed in the finalisation of preferred sites in Wells
DS23	W07/1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP564	Support	The Holkham Estates fully supports the identification of Land adjacent to Holkham Road, Wells for proposed allocation of 60 dwellings. This site is considered to be suitable, available, and achievable. In addition it is noted that development of 60 dwellings at the site would be required to provide 35% onsite provision in accordance with Draft Policy HOU 2 (i.e. 21 affordable dwellings, of which 2 to be 'low cost home ownership'). This requirement is acknowledged and can be fulfilled	Support noted
DS23	W07/1	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP687	General Comments	The survey (clarification added - in the wells NP survey), results showed 42 (16%) of first preferences in favour of this site and 91 (38%) of second preferences	Comments noted

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS23	W07/1	Historic England (1215813)	LP705	Object	<p>There are no designated heritage assets within this site. However the Wells Conservation Area lies to the north east of the site and Holkham Hall grade I registered park and garden lies to the south west of the site. The site is reasonably prominent in the landscape. There is currently no mention of the proximity of the Conservation Area and Registered Park and Garden Paragraph 19.24 should be amended to reflect this. The policy should also make reference to these assets. However, with careful design, some limited development should be possible on this site. We welcome bullet point 1 of the policy that addresses design issues.</p> <p>Suggested Change: Amend policy to reference the Conservation Area and Holkham Hall Registered Park and Garden.</p>	Noted - consider amending the policy to reference the Conservation Area and Holkham Hall Registered Park and Garden.
DS23	W07/1	Historic England (1215813)	LP705	Object	<p>General comments on allocations</p> <p>We are pleased to see that many of the site allocations do refer to the historic environment</p> <p>It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.</p> <p>To that end we make the following suggestions.</p> <p>a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.</p> <p>b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture</p> <p>c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the</p>	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent approach across all proposed allocations within the plan.

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 706					<p>wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

Proposals for Blakeney

DS24: Land East of Langham Road

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

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

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

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

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

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Proposals for Briston

DS25: Land East of Astley Primary School

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 713					<p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
	DS25	BRI01	Norfolk Wildlife Trust (1217447)	LP700	General Comments	<p>There is a high density of ponds in the surrounding landscape, therefore maintenance of ecological connectivity is important in order to prevent the wildlife populations on either side of the village from becoming isolated. We therefore strongly recommend that both allocations include maintained green corridors suitable for the movement of amphibians (and other wildlife) as part of any green infrastructure requirements. Proposed changes:</p> <p>Inclusion of policy requirements for green infrastructure corridors in each allocation suitable for wildlife movement north/south.</p>

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

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DS26: Land West of Astley Primary School

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 716					<p>Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:</p> <p>listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
	DS26	BRI02	Norfolk Wildlife Trust (1217447)	LP700	General Comments	<p>There is a high density of ponds in the surrounding landscape, therefore maintenance of ecological connectivity is important in order to prevent the wildlife populations on either side of the village from becoming isolated. We therefore strongly recommend that both allocations include maintained green corridors suitable for the movement of amphibians (and other wildlife) as part of any green infrastructure requirements. Proposed changes:</p>

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

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

Proposals for Ludham

DS27: Land South of School Road

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 719					<p>wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

DS28: Land at Eastern End of Grange Road

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 721					<p>park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	

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

Proposals for Mundesley

DS29: Land off Cromer Road & Church Lane

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS29	MUN03/A	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority	Noted:- Consider comments in the finalisation of the policy
DS29	MUN03/A	Scarlett Homes, Mr Sean Ohara (Miss Maureen Darrie, Building Partnership Ltd) (1217451 & 1217482)	LP642	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Scarlett Homes is the prospective developer and supports the allocation of site MUN03, which relates to Parcel 1 of the allocation MUN03/A (Figure 18) Mixed Use: Land off Cromer Road & Church Lane, Mundesley.</p> <ul style="list-style-type: none"> Mundesley is a large growth village, identified in the Settlement Hierarchy in the plan. The proposal for 50 residential units is a modest development and consistent with low growth aspirations for the area through the Plan period. There are limited alternative sites with capacity for planned growth in the village. MUN03 is well located in the village with access to available services. The proposed approach to planning site development is landscape led, with provision for a large new area of open space (parcel 3). This respects the local environmental considerations including the setting of the Church and Conservation Area. Any future planning application would be robust and accompanied by a full review of the site and its context, including the value of the village's location on the coast and a landscape and visual impact assessment to ensure that any potential impacts are properly addressed and mitigated. Critical to the success of any Plan is the ability to deliver site allocations. Scarlett Homes is committed to working with the local community to deliver this allocation. The site is under one land ownership which also assists in securing timely delivery The allocation is wholly compliant with NPPF objectives for housing delivery. Small and medium sized sites can make an important contribution to meeting the housing requirement of an area. We are 	Support Noted.

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

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 724					<p>conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>registered park and garden - 'Development should protect the registered park and garden and its setting.'</p> <p>scheduled monument 'Development should protect the scheduled monument and its setting.'</p> <p>combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014</p> <p>Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.</p> <p>There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.</p> <p>Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p>	
	DS29	MUN03/A	Norfolk Wildlife Trust (1217447)	LP701	General Comments	<p>We note that Parcel 2 of this proposed allocation currently appears to have wood or scrub cover and is linked to other areas of former railway line now as green space. If this proposal is allocated, then we recommend that this parcel is retained as wildlife rich open space as part of Mundesley's green infrastructure. Proposed changes: Parcel 2 to be retained and managed as green infrastructure primarily for its wildlife value and contribution to ecological networks.</p>

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

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Proposals for Other Areas

DS30: Tattersett Business Park

Site Policy	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
DS30	E7	Norfolk County Council: Minerals & Waste (931093)	LP739	General Comments	The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.	Noted:- Consider comments in the finalisation of the policy
DS30	E7	Norfolk County Council: Lead Local Flood Authority (LLFA) (931093)	LP831	Support	As agreed at our meeting in September please find attached additional policy wording from the LLFA for the sites discussed and suggested text for brownfield development: The ground conditions may be favourable for shallow infiltration in the West of the site. The East of the site may not be favourable for shallow infiltration and if this is the case the applicant will need to explore options to drain the whole proposed development to the West of the site as this is made up of sandy gravels or seek agreement to connect to a nearby watercourse. There is a flow path running through the site from the East side to the West. The applicant will need to demonstrate that this flow path can be managed avoiding property and SUDs features and without increasing flood risk to and from the site	Noted:-Additional commentary updating previous holding objection (Lp739) from LLFA 16.10.19. Consider comments in the finalisation of the policy
DS30	E7	Historic England (1215813)	LP705	Object	Whilst there are no designated heritage assets within the site boundary, there are two scheduled monuments (a bowl barrow and a saucer barrow) to the south west of the site. Any development has the potential to impact upon the setting of these heritage assets. However, dependent upon the precise nature and scale of development and with careful landscaping along the south western edge of the site some development should be possible on this site. Suggested change: Development should preserve and enhance the scheduled monuments to the south west of the site and their settings.	Noted- consider the potential impact upon the setting of the scheduled monuments to the south west of the site and their setting.
DS30	E7	Historic England (1215813)	LP705	Object	General comments on allocations We are pleased to see that many of the site allocations do refer to the historic environment It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a	Noted- consider revising the wording of the supporting text and the wording of the allocation in regard to the Historic Environment to ensure a consistent

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

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

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

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First Draft Local Plan (Part 1)

Regulation 18 Stage Public Consultation

**Appendix D: Schedule of Representations -
Comments on Alternative Policies & Sites**

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Appendix D: Comments on Alternative Policies & Sites

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Notes

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

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

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

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

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

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

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

First Draft Local Plan (Part 1)

Comments on Alternative Policy Options

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Sustainable Development Policies

Alternatives Considered (Sustainable Development)

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative policy options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Options', e.g. the policies favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred policy option** in the Alternatives Considered document
- an **alternative policy option** in the Alternatives Considered document
- an **alternative policy option** in the First Draft Local Plan

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
SD1	N/A	N/A	N/A	No comments received.	N/A
SD2	Mr & Mrs Johnson (1215700)	AC010	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Support SD2 - Community led development should be subject to the same scrutiny as any development for compliance with planning law and stated policy aims of the Council. Consideration in favour of these developments rather than those of external developers would be appropriate and inclusive of the local community but should not be at the expense of quality, compliance, sustainability or other aspects of the councils stated policy.	Comments noted: This comment repeats the objection SD2 made against the First Draft Local Plan (Part 1) consultation document giving communities a greater say and control in planning is a central aim of government policy. Planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
SD2	Mr & Mrs Johnson (1215700)	AC026	Support	Supports Assessment SD2 - Agree	Comments noted: Supports Assessment SD2
SD3	Mr & Mrs Johnson (1215700)	AC011	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Support SD3 - Development in rural locations with little employment or few services only serves to generate additional car journeys. This is not sustainable and causes additional traffic, congestion, pollution.	Comments noted: The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
					are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD3	Smith, Mr Mark (1209582)	LP038	General Comments	Against the preferred approach of NNDC the alternative SD3A could have been preferred but used to satisfy the allocation of more than one council and minimise if not avoid altogether the need to extend villages, small towns and in some cases large towns. A more strategic plan to mitigate congestion could have been utilised that would have less impact on established settlements in all factors from pollution to safety. Publish any document that corresponds to cooperating with neighbouring councils.	Comments noted: The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD3	Mr Bacon (1217300)	AC065	General Comments	1. Items in Home Policy SS2 which prejudices against those wishing single, small or in fill development for reasons which I cannot find or have not been published. By consultation I was told that one of the reasons being was to restrict the additional commuting within the countryside area, yet it is permissible to build affordable housing, commercial development, development by statutory undertakers or public utility providers, recreation and tourism, renewable energy projects, mineral extraction and waste management facilities, sites for Gypsies and Travellers and travelling show people and ironically transport. Do not ANY of these involve the use of transport within the countryside? 2. Area's of the	Comments noted: The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
Page 738				<p>countryside are littered with unkempt and unsightly plots which would benefit from additional and much needed housing. 3. Freedom of choice is also being restricted to those wishing to live in a countryside location. 4. Protecting Special Character - The ongoing mass development in permitted areas has had a bigger blight on the area than any individual or small countryside development would ever have. Countryside development is more in keeping with the surrounding buildings and areas than most of the mass developments. An example being the Lovell development off the Holt bypass which has put a blot on the landscape with uniform houses matching all those of all Lovell developments across the country and none of these large developments bring jobs for hardly any local tradesmen as they use the cheapest viable options giving rise to poor quality build. 5. Could you please give a definitive answer as to whether the restriction of not allowing the construction of standard new build housing within the countryside is going to be permanent and if not when is the restriction to be lifted and what you have gained from the restriction if they reinstate the permission to build in the future all be it the loss of millions in council tax. 6. How is "countryside" actually designated? From my POV for example Edgefield couldn't more in the countryside than the Houses of Parliament are in London! Yet a new development is currently raising itself? 7. How can the Local Planning Consultation cover planning from 2016 when we are now in 2019?</p>	<p>services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.</p>
	SD3A	Mr Adams (1215905)	AC076	Object	<p>Distribution. I would prefer to see the development of new settlement / settlements rather than the continued expansion of existing settlements. The continued drive towards increasing urbanisation has a detrimental effect on existing settlements and the character of the district as a whole and once its done it cannot be undone. I do not believe that this drive will result in improvements in the quality of life, sustainability and resilience of communities and the people that live there. . This plan is looking into the future but making assumptions based on the present. It is most likely that local travel by car will be environmentally neutral and remote access to both goods & services will increase. . D3A Build a single large new settlement somewhere in the District. ."In order to address the housing needs of the District around 4,500 will need to be built on allocated sites. Such a scale of growth is too small to support the range of services necessary to render a new settlement sustainable. Such a settlement is highly likely to rely on services and jobs elsewhere in the District so would substantially increase commuting, probably by car. A new settlement is</p>

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				<p>not justified by the scale of housing growth requirement.". This statement seems to assert that a settlement of 4500 dwellings is too small to be sustainable. Using figures from NNDC Village Assessment & Settlement Profiles Topic Paper 2018 the number of dwellings in Cromer is 4615, in Holt is 2088, Corpusty & Saxthorpe 354 and Aldborough 297. This means Cromer may just about be sustainable Holt has a lot of problems and Aldborough and Corpusty & Saxthorpe are lost causes. However the paper shows that the smallest of these, Aldborough, has all the key services. All settlements rely to a greater or lesser extent on services provided elsewhere but this is not a justification to dismiss this alternative especially in the knowledge that the introduction of electric vehicles will mean that the occasional need to travel small distances will not conflict with sustainability considerations. . There is no examination of the possibility of providing some of the governments required increase in housing through a number of new small settlements. As illustrated above communities of 300 or 500 dwelling can be thriving and vibrant. It does not have to be all or nothing, there can be a mix and looking at creating a few new villages could reduce the pressure to over develop existing larger settlements. Housing is a bit like manure, too much in one place causes problems but spread it about a bit and everything thrives! . There are many other advantages to this approach which I would be happy to argue, for instance, providing a new small settlement may enable a village school in another nearby small settlement remain viable whereas locating this additional housing in a larger settlement may require a new school to be built and the children from the existing small settlement to be bussed in. . There are also many statements in the plan which should be challenged but time does not permit but here are a few- . Allowing development within the built up areas of the Selected Settlements will prioritise the development of previously developed land. What proportion of developments in Fakenham, Cromer & Holt are brownfield? . Are the elderly at greater risk of isolation in a village rather than a town? . Are journey times in the district more unreliable than getting through Norwich or round the M25?</p>	
SD3B	Mr Hall (1215856)	AC052	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY - Partially Supports Assessment of the site: Object to SD3. Partially support SD3B. The statement regarding major growth in large settlements (Towns) I agree with but your statement about moderate growth in Villages I object to.</p>	<p>Comments noted: Object to preferred Policy SD3, making clear growth should not be allocated in villages. The distribution of growth is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable</p>

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
					communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD3B	Mr Hall (1215856)	AC053	Support	I agree with the arguments against rural dispersal. However, the arguments given must apply to preferred policy SD3 which is allowing 'Moderate' Growth within Villages. Therefore this is contradictory.	Comments noted: Object to preferred Policy SD3, making clear growth should not be allocated in villages. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD3B	Mr Rice (1210475)	AC009	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objecting to the Assessment. By concentrating all new development (with few exceptions) in designated 'growth settlements', the preferred approach takes an overly simplistic, black and white approach. The optimum is a blend of SD3B (Rural Dispersal) and the preferred approach, in which certainly larger scale development is encouraged in the larger settlements, but development (particularly new dwellings) in the rural areas is not so completely restricted. This approach is in line with NPPF paragraph 68(c): 'to promote the development of a good mix of sites LPAs should support development of windfall sites through policy and decisions giving great weight to the benefits of suitable sites which existing	Comments noted: Object to the distribution of growth and supports more rural dispersal of growth. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates

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				settlements'. It does not say that small settlements should be allowed to whither and die: paragraph 78 'Rural Housing' requires that 'planning policies should identify opportunities for villages to grow and thrive'. Paragraph 2.1 of the June 2018 Interim statement of housing land supply notes that 75% of the dwellings built in the previous period occurred in larger settlements, i.e. as a matter of course meeting the proposed new policy of housing being restricted to "growth settlements", and therefore undermines the proposed black and white policy of so absolutely restricting development in the "countryside settlements. Alternative SD3A - all growth in a single new settlement - represents a most extreme solution that patently is wrong.	the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD3B	Mr Adams (1215905)	AC076	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Objecting to the Assessment. Distribution . I would prefer to see the development of new settlement / settlements rather than the continued expansion of existing settlements. The increasing urbanisation has a detrimental effect on existing settlements and the character of the district as a whole and will not result in improvements in the quality of life, sustainability and resilience of communities and the people that live there. This plan is making assumptions based on the present. It is most likely that local travel by car will be environmentally neutral and remote access to both goods & services will increase. D3A Build a single large new settlement somewhere in the District. In order to address the housing needs of the District around 4,500 will need to be built on allocated sites. Such a scale of growth is too small to support the range of services necessary to render a new settlement sustainable. Such a settlement is highly likely to rely on services and jobs elsewhere in the District increasing commuting. A new settlement is not justified by the scale of housing growth requirement.. This statement seems to assert that a settlement of 4500 dwellings is too small to be sustainable. Using figures from NNDC Village Assessment & Settlement Profiles Topic Paper 2018 the number of dwellings in Cromer is 4615, in Holt is 2088, Corpusty & Saxthorpe 354 and Aldborough 297. However the paper shows that the smallest of these, Aldborough, has all the key services. All settlements rely to a greater or lesser extent on services provided elsewhere - not a justification to dismiss this alternative especially if the introduction of electric vehicles means that the occasional small distances travel will not conflict with sustainability. There is no examination of the possibility of providing some of the governments required increase in housing through a number of new small settlements. It does not have to be all or nothing, there can be a mix and looking at creating a few new villages. There are many other advantages to this approach, for instance, providing a new</p>	Comments noted: Object to preferred Policy SD3, making clear growth should not be allocated in villages. The distribution of growth is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.

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				small settlement may enable a village school in another nearby small settlement remain viable whereas locating this additional housing in a larger settlement may require a new school to be built and the children from the existing small settlement to be bussed in. Allowing development within the built up areas of the Selected Settlements will prioritise the development of previously developed land.	
SD4	Mr & Mrs Johnson (1215700)	AC012	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support decisions made in respect of SD4A. The preservation of rural economy is essential. Development appropriate for this is necessary and should positively favour those working in the rural economy	Comments noted: The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
SD4	Mr Bacon (1217300)	AC065	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objecting to SD4. 1. Items in Home Policy SS2 which prejudices against those wishing single, small or in fill development for reasons which I cannot find or have not been published. By consultation I was told that one of the reasons being was to restrict the additional commuting within the countryside area, yet it is permissible to build affordable housing, commercial development, development by statutory undertakers or public utility providers, recreation and tourism, renewable energy projects, mineral extraction and waste management facilities, sites for Gypsies and Travellers and travelling show people and ironically transport. Do not ANY of these involve the use of transport within the countryside? 2. Area's of the countryside are littered with unkempt and unsightly plots which would benefit from additional and much needed housing. 3. Freedom of choice is also being restricted to those wishing to live in a countryside location. 4. Protecting Special Character - The ongoing mass development in permitted areas has had a bigger blight on the area than any individual or small countryside development would ever have. Countryside development is more in keeping with the surrounding buildings and areas	Comments noted: The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need. The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				<p>than most of the mass developments. An example being the Lovell development off the Holt bypass which has put a blot on the landscape with uniform houses matching all those of all Lovell developments across the country and none of these large developments bring jobs for hardly any local tradesmen as they use the cheapest viable options giving rise to poor quality build. 5. Could you please give a definitive answer as to whether the restriction of not allowing the construction of standard new build housing within the countryside is going to be permanent and if not when is the restriction to be lifted and what you have gained from the restriction if they reinstate the permission to build in the future all be it the loss of millions in council tax. 6. How is "countryside" actually designated? From my POV for example Edgefield couldn't more in the countryside than the Houses of Parliament are in London! Yet a new development is currently raising itself? 7. How can the Local Planning Consultation cover planning from 2016 when we are now in 2019?</p>	<p>are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.</p>
SD4A	Mr Rayner (1204056)	AC062	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. CPRE Norfolk is strongly opposed to the alternative option SD4A which would allow for more growth in the Countryside Policy Area, as this would undermine the rural character of the District, and endanger the positive actions taken elsewhere in the draft Plan to combat climate change. In particular the alternative option SD4A would lead to an increase in the number of vehicle journeys to and from places of work, schools and for shopping and leisure, as well as through a greater number of delivery journeys.</p>	<p>Comments noted: Supports Assessment of the site.</p>
SD4A	Cromer (1218420)	LP732	Support	<p>The alternative option SD4A would lead to an increase in the number of vehicle journeys to and from places of work, schools and for shopping and leisure, as well as through a greater number of delivery journeys - .strongly opposed to the alternative option SD4A (rejected option) which would allow for more growth in the Countryside Policy Area, as this would undermine the rural character of the District, and endanger the positive actions taken elsewhere in the draft Plan to combat climate change.</p>	<p>Agree: The Alternative option SD4a is not the preferred approach and is considered to undermine the sustainability of the District and could lead to increased growth in rural areas.</p>
SD5	Mr & Mrs Johnson (1215700)	AC013	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Support SD5 - additionally developer contributions & evidence to support development should include environmental impact, traffic generation, disruption to residents and traffic during development, and sustainability. Prevent developers seeking planning permission purely to increase the value of their land / assets with no intention of going to construction stage. Work on site should start within 6 years or planning permission should be rescinded. To ensure allocated sites come forward and contribute to housing supply. Ensure fulfilment of any section 106 agreements in full as a minimum.</p>	<p>Comment Noted: One of the tests of soundness for the purposes of Local Plan Examination is the test of deliverability. All sites within the plan must be demonstrably deliverable and will therefore come forward through the plan period.</p>

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
SD6	Mr & Mrs Johnson (1215700)	AC014	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The retention of local facilities can only be sustainable if their costs and outgoings are sustainable and their customer base is retained. High taxes for businesses and the discouragement of their customers through high parking charges or lack of accessibility will erode sustainability of businesses and facilities.	Comments noted: Criterion 2 of Policy SD 6 caveats this to set out that "the loss of premises will not be permitted unless it can be demonstrated that there is no reasonable prospect of retention of the facility or service; and if it is a commercial operation it has been marketed for a period of at least 12 months, a viability test has demonstrated that the use is no longer viable and that all reasonable efforts have been made to sell or let the property at a realistic market price".
SD7	Mr & Mrs Johnson (1215700)	AC015	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment of SD7 - Norfolk already makes a large contribution to renewable energy through the offshore wind farms along the coast- more than inland counties. The building of land based turbines and their inherent impact on the appearance and character of the countryside should be discouraged whilst there remains the ability to construct turbines offshore. Solar farms are also unsightly and completely uncharacteristic of the county. Steps should be taken to limit their development, particularly as land is required for agriculture. Reduction in the amount of land available for agriculture puts more pressure on the land that is remaining and encourages intensive farming to maintain yields. This results in poor environment and bio diversity and loss of habitat for wildlife. Solar farms should have surrounding hedges and appropriate wildlife (insect) friendly planting. They should not just be grassed over. Rain water run-off from the panels should be used for agriculture.	Comments noted: This comment repeats the support SD7 made against the First Draft Local Plan (Part 1).
SD8	Mr & Mrs Johnson (1215700)	AC016	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The introduction of broadband and fibre across the county is important. Reliable broadband is essential in order to reduce traffic journeys and congestion through commuting as employees could work remotely from areas of employment. Unfortunately where broadband has been introduced the nature of the broadband is inappropriate. Download speeds for recreational activities are good but upload speeds that are required by those working remotely continue to be poor. A policy of appropriate broadband should be encouraged so that employment and commercial use is prioritised through better upload speeds and not frivolous use. Providers of broadband infrastructure need to be made to do this.	Comments noted: This comment repeats the support SD8 made against the First Draft Local Plan (Part 1).

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
SD9	Mr & Mrs Johnson (1215700)	AC017	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: See also comments on SD8 re appropriate upload and download speeds for remote employment working. Provision of broadband alone may meet the policy but will not best serve the population if it is merely for entertainment use and does not prioritise business, employment and education. The siting of masts and infrastructure must be controlled whether they are necessary or not. It is possible to provide appropriate masts and infrastructure disguised as necessary to mitigate impact (there are good examples of this elsewhere in the country.)	Comments noted: This comment repeats the support SD9 made against the First Draft Local Plan (Part 1).
SD10	Mr & Mrs Johnson (1215700)	AC018	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment of SD7 - The policy should discourage building on flood plains.	Comments noted: This comment repeats the support SD10 made against the First Draft Local Plan (Part 1).
SD11	Mr & Mrs Johnson (1215700)	AC019	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is pointless building homes on the coast to serve the local community if they are all snapped up by second home owners. That does not address the needs of the local community. That will just lead to continued demand for more housing. Second home ownership pushes up costs and demand for affordable housing. Second home ownership should be discouraged by charging full council tax, business rates where appropriate and by local occupancy clauses in developments. The acquisition of development sites by individuals for the purpose of second homes should be positively discouraged. There are many examples of homes of this nature on the coast built with inappropriate materials, out of character detailing and inappropriate size. Also too many overdeveloped sites are changing the character of the villages.	Comments noted: This comment repeats the support SD11 made against the First Draft Local Plan (Part 1).
SD12	Mr & Mrs Johnson (1215700)	AC020	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are now many second homes in coastal villages. Allowing development to allow roll back and people to move because of erosion is fine for local residents. Development and gradual using up of the rural countryside to allow second home owners to relocate is not a good use of limited resources. Local occupiers affected by erosion should be given priority.	Comments noted: This comment repeats the support SD12 made against the First Draft Local Plan (Part 1).
SD13	Mr & Mrs Johnson (1215700)	AC021	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of SD13 - Development itself causes pollution. All developments should have an environmental impact statement considered as part of the planning process. Noise in particular and effect on adjacent occupants, traffic disruption, dust and emissions, use of appropriate materials should all be considered. Noise from completed development (whether existing or new) should be rigorously controlled. The inconvenience of adjacent occupiers should be prevented. Developments that could potentially cause noise should have appropriate planning conditions attached to prevent that occurring. North Norfolk is	Comments noted: This comment repeats the support SD13 made against the First Draft Local Plan (Part 1).

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				one of the least light polluted counties in England. Long may this continue and a gradual erosion of this by inappropriate lighting schemes should be prevented. LED lighting with downward lighting only should be used. Schemes that allow uplighting and unnecessary light spillage should be rejected.	
SD14	Mr & Mrs Johnson (1215700)	AC022	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment SD14. Development should take place in areas where there is access to facilities and employment in order to limit road use. The impact of additional junctions, traffic lights and roundabouts on the flow of existing traffic should be considered. There are many examples – not necessarily in Norfolk- where a large development such as a supermarket or retail park has been allowed to have a traffic light controlled junction onto a major route causing long delays in through traffic. Inconvenience for many people on a daily basis result - all so that one business can make a profit.	Comments noted: This comment repeats the support SD14 made against the First Draft Local Plan (Part 1).
SD15	Mr Hall (1215856)	AC054	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Object to SD15 - The provision of parking in residential areas needs to be increased. The exact thing you are trying to avoid, parking on Highways, footpaths will happen with your existing policy. Therefore it is possible a 3 bed house could have 3 cars and only 1 external parking space. This will be more relevant in rural areas where sustainable transport options are not realistic or available.	Comments noted: Objects to Assessment of 15A. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car. It is considered that poorly designed schemes can lead to inappropriate parking and highway issues and appropriate provision alongside new development to minimum standards and above is necessary. The approach adopts the County Council standards.
SD15	Mr & Mrs Johnson (1215700)	AC023	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially supports assessment SD15. Parking on rural roads in villages should be discouraged. Narrow roads which fall short of current design standards for width, sightlines, footways and alignment can become dangerous if partially blocked or narrowed or sightlines are blocked by inappropriate parking. Access for residents and emergency vehicles in particular can become difficult. Parking that does not impact on access roads should be encouraged and built into the development.	Comments noted: This comment repeats the support SD15 made against the First Draft Local Plan (Part 1).
SD16	Mr & Mrs Johnson (1215700)	AC024	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It is a fallacy that electric vehicles are the cure for traffic pollution and carbon dioxide emissions. Electricity has to be generated and all electric cars do is move the point at which CO2 is generated from car engines to a central location in the form of a power station. There is a failure at central Government level to provide sufficient future power generation capacity to meet the predicted demand from electric cars or for phone charging, smart devices and home computers Windfarms are not enough and the	Comments noted: This comment repeats the support SD16 made against the First Draft Local Plan (Part 1).

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				government has failed to make provision for the additional power generation needed. It is nevertheless important to provide appropriate connection for when the real problem of future power generation is resolved. The way to reduce pollution is to reduce traffic. That can be done by making sure housing development takes place near areas of employment and broadband is suitable for home working.	
SD17	N/A	N/A	N/A	No comments received.	N/A

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
SD1	0	0	0	No comments received.
SD2	0	2	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD3	1	0	2	A mixed set of responses. Support was repeated for the preferred option made against the First Draft Local Plan (Part 1). Limited support for the alternative options to disperse growth through the district and to provide for the planned growth through the provision of a new settlement.
SD3A	1	0	0	
SD3B	3	1	0	
SD4	2	0	0	Limited objection to the proposed approach on the basis that this would not allow for further growth in the countryside. These limited objections offer support to the alternative approach to distribute more growth in the countryside.
SD4A	0	2	0	CPRE and one Town Council set out that more growth in the countryside would undermine the rural character of the district and lead to more journeys by car. This objection offers support to the preferred option made against the First Draft Local Plan (Part 1).
SD5	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD6	0	0	1	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD7	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.

SD8	0	0	1	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD9	0	0	1	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD10	0	0	0	No comments received.
SD11	0	0	0	No comments received.
SD12	0	0	0	No comments received.
SD13	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD14	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD15	1	1	0	No comments were made in support of a viable alternative option to the preferred approach.
SD16	0	0	1	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
SD17	0	0	0	No comments received.

Environment Policies

Alternative Policies (Environment)

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative policy options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Options', e.g. the policies favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred policy option** in the Alternatives Considered document
- an **alternative policy option** in the Alternatives Considered document
- an **alternative policy option** in the First Draft Local Plan

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
ENV1	Mr & Mrs Johnson (1215700)	AC025	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ENV1. There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.	Comments noted: This comment repeats the support ENV1 made against the First Draft Local Plan (Part 1).
ENV2	N/A	N/A	N/A	No comments received.	N/A
ENV3	Mr & Mrs Johnson (1215700)	AC027	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV3. - There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the	Comments noted: This comment repeats the support ENV1 made against the First Draft Local Plan (Part 1).

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				character of the area.	
ENV4	Mr & Mrs Johnson (1215700)	AC028	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ENV4. - Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided	Comments noted: This comment repeats the support ENV4 made against the First Draft Local Plan (Part 1).
ENV5	Mr & Mrs Johnson (1215700)	AC029	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV5. - Green infrastructure should be considered in terms of its overall contribution as wildlife corridors and prevent isolation of green areas in order to encourage biodiversity.	Comments noted: This comment repeats the support ENV5 made against the First Draft Local Plan (Part 1).
ENV6	Mr & Mrs Johnson (1215700)	AC030	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV6. - This is absolutely necessary to prevent the erosion of biodiversity, and to provide a network of wildlife habitat across the county and not just isolated areas. See comments on ENV1. As many trees, hedgerows, coppices, ponds and mature areas of woodland as possible should be retained. On any developed land trees and hedges should be retained and protected by planning conditions wherever possible.	Comments noted: This comment repeats the support ENV6 made against the First Draft Local Plan (Part 1).
ENV7	Mr & Mrs Johnson (1215700)	AC031	General Comments	Policy SD13 should not be compromised by this.	Comments noted: This comment repeats the support ENV7 made against the First Draft Local Plan (Part 1).
ENV8	Mr & Mrs Johnson (1215700)	AC032	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV8. - Recent issues surrounding access to the coast as a result of some national policy have caused concern. There are issues regarding access in certain areas of wildlife habitat and disturbance by inappropriate behaviour, noise and dogs. Organisations such as National Trust and NWT try to strike a balance between access for all at certain times of year and restricted access at other times to prevent wildlife disturbance or habitat erosion, especially where endangered species are concerned. Consultation with these and other	Comments noted: This comment repeats the support ENV8 made against the First Draft Local Plan (Part 1).

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				experienced organisations or bodies is essential in developing a policy.	
ENV9	Mr & Mrs Johnson (1215700)	AC033	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ENV9. - Larger properties and/or second homes built by individuals along the NN coast on infill sites are in many cases very poorly conceived and detailed, use inappropriate materials, are of unsympathetic character, too large and in no way serve to enhance the character or appearance of the area. We would welcome a policy to prevent the proliferation of such unsympathetic development.	Comments noted: This comment repeats the support ENV9 made against the First Draft Local Plan (Part 1).
ENV10	Mr & Mrs Johnson (1215700)	AC034	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV10. - Essential. Particularly in respect of noise, disturbance, and erosion of the character of a place.	Comments noted: This comment repeats the support ENV10 made against the First Draft Local Plan (Part 1).
ENV11A	Norfolk County Council: Historic Environment (931093)	LP739	Support	The County Council agree with the Preferred Approach which identifies the need for a policy to ensure a positive approach to the conservation and enhancement of the historic environment. The Alternative Approach (no policy) would not be acceptable.	Support for the preferred approach and dismissal of the alternative is noted

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	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
ENV1	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV2	0	0	0	No comments received.
ENV3	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV4	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV5	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV6	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.

ENV7	0	0	1	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV8	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV9	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV10	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ENV11A	1	0	0	County Council object to the alternative approach and in doing so support the preferred option made against the First Draft Local Plan (Part 1).

Housing Policies

Alternative Policies (Housing)

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative policy options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Options', e.g. the policies favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred policy option** in the Alternatives Considered document
- an **alternative policy option** in the Alternatives Considered document
- an **alternative policy option** in the First Draft Local Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
HOU1	Mr & Mrs Johnson (1215700)	AC035	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment HOU1. - Evidence of how the original figure of 8000 new homes was arrived at should be included. In the interests of transparency the strategic housing market assessment should be appended to show how the council has arrived at this figure. Should the uptake of sites not be fully realised but at least 8000 (your figure) be built thereby meeting the Government's target would the council review the target and determine at that time whether it is appropriate to continue to the figure of 11000, whether the uplift is still appropriate or needed, or re assess the figure and lower it in order to avoid over development? Is there provision in the plan / policy to do so or is the county locked into building 11000 houses regardless of changes in demographic or demand? HOU1a and HOU1b are definitely inappropriate. .Any policy should be capable of review during its life and not have a target simply set for 20 years	Comments noted: This comment repeats the support HOU1 made against the First Draft Local Plan (Part 1).
HOU2	Mr & Mrs Johnson (1215700)	AC036	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment HOU2. - In some areas provision of houses of a certain type / size will encourage second home owners. These types of property should have local occupancy rules to prevent lack of this type for local people.	Comments noted: This comment repeats the support HOU2 made against the First Draft Local Plan (Part 1).
HOU3	N/A	N/A	N/A	No comments received.	N/A

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
HOU4	Mr & Mrs Johnson (1215700)	AC037	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment HOU4. - The policy must stop these homes being subsequently sold for other purposes or for second homes.	Comments noted: This comment repeats the support HOU4 made against the First Draft Local Plan (Part 1).
HOU5	N/A	N/A	N/A	No comments received.	N/A
HOU6	Mr & Mrs Johnson (1215700)	AC038	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment HOU6 - Larger properties and/or second homes built by individuals along the NN coast on infill sites are in many cases very poorly conceived and detailed, use inappropriate materials, are of unsympathetic character, too large and in no way serve to enhance the character or appearance of the area. A similar problem occurs with owners of larger gardens selling off part of the garden for development. In many cases this alters the character of the village / town by gradual urbanisation and constitutes a loss of green space / habitat and would contravene several of the ENV policies. We would like to think that this policy would prevent the proliferation of unsympathetic development.	
HOU7	Mr & Mrs Johnson (1215700)	AC039	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Would be best if used under policy HOU4 as a priority	Comments noted: This comment repeats the support HOU7 made against the First Draft Local Plan (Part 1).
HOU8	Miss Foster (1210042)	AC001	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is a lack of attention being paid to the effects on younger disabled people of the refusal to allow extra (suitable) housing to be built in most villages. My personal situation is this. I have a wide range of neurological problems, including visual impairment and noise sensitivity. I am unable to drive and not particularly mobile. I moved to Norfolk to an area where I already have friends, without whom I would not have coped at all. It is not easy for a visually impaired person to learn a new area, and I am starting to do freelance work locally. For all these reasons, moving to a different village which is on the plan, or to one of the main settlements is not possible. It should not be assumed that disabled people can be provided for by moving them to a different area, which any plan of allowing housing to be built only in specific places unintentionally does. I am living in a very	Comments noted: Policy HOU8 introduces the requirement to ensure homes are built to adaptable and accessible standards. The Council's allocation (occupation policy) is a housing strategy document and not subject to consultation in this local plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
				isolated place about three miles from my support network in rented housing which is unsuitable for my physical needs in more than one way. I have been on the council housing lists for two and a half years, and am in the top priority bracket. However, it is my belief that there is no suitable council housing in the area, as, due to noise sensitivity problems, I need any non-detached dwelling to have extremely good sound insulation, plus I have problems with steep stairs. Suitable commercial rentals are beyond my budget, and in any case, as I am on housing benefit, most landlords won't take me as a tenant.	
HOU9	Mr & Mrs Johnson (1215700)	AC040	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Not at the expense of HOU6 or ENV policies.	Comments noted: This comment repeats the support HOU9 made against the First Draft Local Plan (Part 1).
HOU10	N/A	N/A	N/A	No comments received.	N/A
HOU11	Mr & Mrs Johnson (1215700)	AC041	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: BUT not if the materials used are inappropriate under policy HOU6. Not if materials provide poor durability or high maintenance as that may affect uptake and older people in particular.	Comments noted: This comment repeats the support HOU11 made against the First Draft Local Plan (Part 1).

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	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU1	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
HOU2	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
HOU3	0	0	0	No comments received.
HOU4	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
HOU5	0	0	0	No comments received.

HOU6	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
HOU7	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
HOU8	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
HOU9	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
HOU10	0	0	0	No comments received.
HOU11	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).

Economy Policies

Alternative Policies (Economy)

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative policy options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Options', e.g. the policies favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred policy option** in the Alternatives Considered document
- an **alternative policy option** in the Alternatives Considered document
- an **alternative policy option** in the First Draft Local Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
ECN1	Mr & Mrs Johnson (1215700)	AC042	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Employment areas should consider the availability of local workforce and not encourage commuting and travel of long distances.	Comments noted: This comment repeats the support ECN1 made against the First Draft Local Plan (Part 1).
ECN2	N/A	N/A	N/A	No comments received.	N/A
ECN3	Mr & Mrs Johnson (1215700)	AC043	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Should not be implemented at the expense of HOU6 which should also apply as far as possible to employment development.	Comments noted: This comment repeats the support ECN3 made against the First Draft Local Plan (Part 1).
ECN4	Mr & Mrs Johnson (1215700)	AC044	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The sustainability of local centres of facilities such as shops and businesses depends upon those businesses having trade. Excessive parking charges and lack of parking for users and operators discourages use of such businesses. This should be borne in mind when setting rates.	Comments noted: This comment repeats the support ECN4 made against the First Draft Local Plan (Part 1).
ECN5	N/A	N/A	N/A	No comments received.	N/A
ECN6	Mr & Mrs Johnson	AC045	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ECN6 - Development should not be at the expense of any ENV policies and	Comments noted: This comment repeats the support ECN6 made

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
	(1215700)			subject to similar requirements to HOU6.	against the First Draft Local Plan (Part 1).
ECN7	N/A	N/A	N/A	No comments received.	N/A
ECN8	N/A	N/A	N/A	No comments received.	N/A
ECN9	N/A	N/A	N/A	No comments received.	N/A

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
ECN1	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
ECN2	0	0	0	No comments received.
ECN3	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
ECN4	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
ECN5	0	0	0	No comments received.
ECN6	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ECN7	0	0	0	No comments received.
ECN8	0	0	0	No comments received.
ECN9	0	0	0	No comments received.

Vision, Aims & Objectives

Vision, Aims & Objectives

Vision & Aims	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
Vision & Aims	N/A	N/A	N/A	No comments received.	N/A

	Number Received	Summary of Responses (Vision & Aims)
Objection	0	None received.
Support	0	
General Comments	0	

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First Draft Local Plan (Part 1) Comments

Comments on Alternative Site Options

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Cromer

Alternative Sites in Cromer

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Cromer	C10/1	Mrs Cole (1209821)	AC003	Object	In line with other proposed sites that have been deemed unsuitable for development this site is beyond the current confines of the Cromer Town and would impact on the special qualities it affords being an area of such longstanding natural beauty. Development at this location would have an adverse impact on the important character of the border area between East Runton Village and Cromer Town and it has always been considered important to retain the open character of this land and current use for the local and holiday community as well as the historic Runton Gap. There are concerns about the local road network via East Runton Village, Mill Lane etc., to access this site which will cause much disruption to the local community and directly impact on the access to the many holiday park sites along this coast road. This site provides an important open space which is accessed daily by the local community of East Runton and Cromer Town and has great recreational value. I note the site RUN076 Land at Mill Lane was not considered to be suitable as the site is located in East Runton which is not a selected settlement - this land is also in East Runton and I would have thought the same reasons for exclusion applies - if not why not?	Comments noted: Consider feedback in the finalisation of preferred sites.
Cromer	C18	Duncan, Mr Phillip (1217309)	LP419	Object	1. Site is described as having "some mature trees along eastern boundary". In fact it has the Becketts Plantation – which also forms part of the edge of site C22/1, where it is described as "woodland". Inaccurate description and inconsistency. 2. Furthermore, the site is well contained not only by Becketts Plantation but also by roadside hedgerow. 3. Site is described as wrapping behind existing housing	Comments noted: Support for alternative site C18. Consider amendments to the wording of the assessment. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>and also protruding beyond “into the open countryside”. This is also true of Site C22/1 (which is identified as Preferred), which is identified as being visible from the south, yet “shouldn’t have a detrimental impact on the landscape and wider countryside” .There is therefore no justification for the statement that if C18 was developed it would have an “adverse impact on the special qualities of the AONB, landscape and townscape” and inconsistency between site assessments.</p> <p>4. The conclusion suggests there would be “a negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside and would have a greater material impact on the AONB than the preferred sites.” There is no evidence for this, particularly as Site C22/1 extends further south than C18; and both C22/1 and C18 sites share the Becketts Plantation boundary. 5. The conclusion states C18 has poorer access to services and facilities, but there is no reasoning given, and this does not take account of C18 being within walking distance to schools and services, with bus stops nearby, and one of the closest sites to Roughton Road station. 6. The Sustainability Appraisal scores for C18 are the same as or better than C22/1. This is not acknowledged.</p>	
<p>Page 763</p> <p>63</p> <p>63</p>	C18	Innova Property Ltd (1217373)	LP364	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Site is described as having “some mature trees along eastern boundary”. In fact it has the Becketts Plantation – which also forms part of the edge of site C22/1, where it is described as “woodland”. Inaccurate description and inconsistency. 2. Furthermore, the site is well contained not only by Becketts Plantation but also by roadside hedgerow. 3. Site is described as wrapping behind existing housing and also protruding beyond “into the open countryside”. This is also true of Site C22/1 (which is identified as Preferred), which is identified as being visible from the south, yet “shouldn’t have a detrimental impact on the landscape and wider countryside” .There is therefore no justification for the statement that if C18 was developed it would have an “adverse impact on the special qualities of the AONB, landscape and townscape” and inconsistency between site assessments.4. The conclusion suggests there would be “a negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside and would have a greater material impact on the AONB than the preferred sites.” There is no evidence for this, particularly as Site C22/1 extends</p>	Comments noted: Consider comments in the development of the policy.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					further south than C18; and both C22/1 and C18 sites share the Becketts Plantation boundary. 5. The conclusion states C18 has poorer access to services and facilities, but there is no reasoning given, and this does not take account of C18 being within walking distance to schools and services, with bus stops nearby, and one of the closest sites to Roughton Road station. 6. The Sustainability Appraisal scores for C18 are the same as or better than C22/1. This is not acknowledged.	
Cromer	C19	Duncan, Mr Phillip (1217309)	LP419	Object	1. Inaccurate information used in the assessment: a) The “informal path” identified in the C19 assessment is in fact a Public Right of Way; b) Site owner confirms there are no water mains crossing the site. A water main follows the line of the PROW; c) The site is not located off Metton Road 2. Site is identified as having “No flooding, utilities or contamination issues” . This does not apply to any of the sites identified as Preferred Sites.	Comments noted: Consider amendments to the wording of the assessment. Consider feedback in the finalisation of preferred sites.
Cromer	C19	Innova Property Ltd (1217373)	LP364	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Inaccurate information used in the assessment: a) The “informal path” identified in the C19 assessment is in fact a Public Right of Way; b) Site owner confirms there are no water mains crossing the site. A water main follows the line of the PROW; c) The site is not located off Metton Road 2. Site is identified as having “No flooding, utilities or contamination issues” . This does not apply to any of the sites identified as Preferred Sites.	Comments noted: Consider comments in the development of the policy.
Cromer	C19/1	Duncan, Mr Phillip (1217309)	LP419	Object	1. Inaccurate information used in the assessment: a) The “informal path” identified in the C19/1 assessment is in fact a Public Right of Way; b) Site owner confirms there are no water mains crossing the site. A water main follows the line of the PROW; 2. Site is identified as having “No flooding, utilities or contamination issues” . This does not apply to any of the sites identified as Preferred Sites.	Comments noted: Consider amendments to the wording of the assessment. Consider feedback in the finalisation of preferred sites.
Cromer	C19/1	Innova Property Ltd (1217373)	LP364	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Inaccurate information used in the assessment: a) The “informal path” identified in the C19/1 assessment is in fact a Public Right of Way; b) Site owner confirms there are no water mains crossing the site. A water main follows the line of the PROW; 2. Site is identified as having “No flooding, utilities or contamination issues” . This does not apply to any of the sites identified as Preferred Sites.	Comments noted: Consider comments in the development of the policy.
Cromer	C22/1	Innova Property Ltd	LP364	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Proposed use is described as “housing” yet the conclusion identifies	Comments noted: Consider comments in the development of the policy.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response	
Page 765		(1217373)			<p>it as preferred for sports pitches and facilities. There is no explanation or evidence for this. 2. Site is “considered unsuitable for development” yet is identified as a Preferred Option. Inconsistent and therefore unjustifiable as a Preferred Option. 3. No evidence for the statement “development on this site shouldn’t have a detrimental impact on the landscape and wider countryside”, particularly as it requires a footbridge and roundabout, and is “visible from the south and immediate surrounding area. 4. The topography of the site is not significantly different from the topography of other sites proposed. 5. Inconsistency in the description that the site has “no contamination issues” yet the SA records it has “potential for remediation of contamination” 6. The conclusion suggests The site scores positively in the Sustainability Appraisal. This statement applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. Furthermore, the summary assessment in the SA is inconsistent – see detailed comments on SA. 7. The conclusion suggests “This is considered to be one of the most sustainable and suitable of the Cromer alternatives”. There is no evidence for this conclusion, particularly as it is visible; requires construction of a new footbridge and a new roundabout in order to be considered suitable; and the presence of large mature trees along the road from which access is proposed and has risk of flooding. 8. NCC Highways has recently expressed fundamental concerns about the proposed site access 9. The assessment suggests No utilities issues. However, there are limited utilities available on the site, and ownership issues restrict access for at least two essential services.</p>		
	Cromer	C25	Hannant, B (1216654)	LP210	SupportuppObjectrt	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Alternatives Considered document states that C25 is not considered to be suitable for development on its own. Wish for it to be included as part of the site allocation reference C22/1 and feels that this would be a sensible and workable solution. Or to be included as a separate site allocation as the land in question forms a reasonable sized infill plot between Pine Tree Farm and the run of houses stretching south along the A149. The question of accessibility is also mentioned but with a suitably positioned access this is feasible with suitable visibility.</p>	Comments noted: Consider feedback in the finalisation of preferred sites.
	Cromer	C41	Duncan, Mr Phillip (1217309)	LP419	Object	<p>1. A link road is sought by NCC highways 2. The potential for a link road appears to have been inappropriately assessed with a suggestion of proof being required regarding the benefit of a link</p>	Comments noted: Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>road. We have recently received confirmation from Norfolk County Council that there would be significant benefits in the delivery of a new link road and it would support such a proposal. It could be developer funded if a larger site were allocated, and would release opportunities for the town including other necessary infrastructure and community improvements.</p> <p>3. Allocation of this would enable strategic development of Cromer to provide relief from existing traffic problems in the centre of town; ending rat running along unsuitable roads such as Carr Lane. 4. It would also enable a planned and phased approach, enabling requisite infrastructure and housing over the plan period – an overall masterplan approach rather than piecemeal development.</p>	
Cromer	C41	Innova Property Ltd (1217373)	LP364	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. A link road is sought by NCC highways 2. The potential for a link road appears to have been inappropriately assessed with a suggestion of proof being required regarding the benefit of a link road. We have recently received confirmation from Norfolk County Council that there would be significant benefits in the delivery of a new link road and it would support such a proposal. It could be developer funded if a larger site were allocated, and would release opportunities for the town including other necessary infrastructure and community improvements. 3. Allocation of this would enable strategic development of Cromer to provide relief from existing traffic problems in the centre of town; ending rat running along unsuitable roads such as Carr Lane. 4. It would also enable a planned and phased approach, enabling requisite infrastructure and housing over the plan period – an overall masterplan approach rather than piecemeal development.</p>	Comments noted: Consider comments in the development of the policy.
Cromer	C41	Innova Property Ltd (1217373)	LP364	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. Inconsistency. This site is labelled as “Norwich Road” but the map in the Alternative sites document considered shows C44 it as located off the Roughton Road – but without any clear boundaries. It is assumed from other references to be the site subject to planning application PO/18/1551. 2. Inaccurate information used in the assessment: a) The “informal path” identified in the C19/1 assessment is in fact a Public Right of Way b) Site owner confirms there are is no drain running through part of the site 3. Site description “There are mature trees on the western boundary” ignores the fact that part of the western boundary is the woodland known as Larners Plantation. Furthermore, there is no mention of</p>	Comments noted: Consider feedback in the finalisation of preferred sites. References to Norwich road will be updated to Roughton Road site (C44)

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>the roadside and other field boundary hedgerows or of Becketts Plantation on the Eastern boundary (described in C22/1 assessment as woodland). 4. Site is described as wrapping behind existing housing and also protruding beyond “into the open countryside”. This is also true of Site C22/1 (which is identified as Preferred), which is identified as being visible from the south, yet “shouldn’t have a detrimental impact on the landscape and wider countryside” .There is therefore inconsistency between site assessments. 5. The conclusion suggests that the site has a number of constraints but this is inconsistent with the site description. 6. There is no reasoning or justification for the statement in the conclusion that the site would adversely affect the settlement. The site adjoins existing development 7. The conclusion suggests there would be “a negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside and would have a greater material impact on the AONB than the preferred sites.” There is no evidence for this, particularly as it is acknowledged that the western part of site C44 is “visually well screened”; both C22/1 and C44 sites share the Becketts Plantation boundary; and Site C22/1 extends further south than C44. 8. The conclusion states C44 has poorer access to services and facilities (than what?), but there is no reasoning given, and this does not take account of C44 being within walking distance of infant, junior and high school and to the town centre with a range of services and facilities available; with bus stop nearby, and the site being one of the closest sites to Roughton Road station. 9. Site is identified as having “No flooding, utilities or contamination issues” . This does not apply to any of the sites identified as Preferred Sites.</p>	
Cromer	C42	Northrepps Parish Council (1218479)	LP789	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative site - Land at Roughton Road Northrepps Parish Council object to this application and stand by their original concerns: • Concern re the number and density of the housing. • Concern re the impact of the increased traffic movements on the surrounding road network. • Concern re the impact on the infrastructure including health services, care in the community, schools. • The necessary infrastructure must be in place before any developments are considered. • Concern re the loss of agricultural land. • Concern re the impact on the AONB.</p>	Support noted: This site has been identified as being affected by a number of constraints and is considered unsuitable for allocation at this time . The Council has fully engaged with key service providers to identify the likely impacts of development for local highways, water, and sewerage and energy networks. These issues along with wider constraints have been taken into account in site assessment.
Cromer	C44	Mr Duncan	AC071	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p>	Comments noted. Consider feedback in

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Page 768		(1217039)			<p>Alternatives considered The map of sites does not clearly identify site boundaries. There are inconsistencies, for example Site C44 is described as Norwich Road but is labelled on the plan of Alternative sites as somewhere in the vicinity of Roughton Road. Regarding the Preferred Site Options C07/2; C10/1; C16 and C22/1, all are identified as being preferred because: a) The site scores positively in the Sustainability Appraisal. However, in the Sustainability Appraisal, scoring positively applies to many other Cromer sites, including those not identified as Preferred Options. However, detailed analysis of the Development Site Methodology Background Paper shows all of the Preferred Sites have sustainability issues, and therefore there is no justification for this statement. Site ref C22/1 is identified in the Alternatives for housing only. The Background Paper 6 also identifies the Proposed Use as Housing. However in the Methodology Paper Conclusion site C22/1 is identified a suitable for allocation for sports pitches and facilities. If a need for sports pitches and facilities has been established, this should have been considered for other sites. There is, however, no such consideration shown in the Draft LP: Alternatives Considered. The comments made in the Why it is preferred and Why it is not preferred columns reflect the comments made in Site Methodology Background Paper. We suggest that C44 offers an available and deliverable mixed use site offering housing, sporting and care facilities for Cromer, and that it has not been appropriately assessed in the LP process.</p>	the finalisation of preferred sites. References to Norwich road will be updated to Roughton Road site (C44)
	Cromer	C44	Mr Duncan (1217309)	AC070 AC071	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objecting to the Assessment C44. Draft Local Plan: Alternatives considered The map of sites does not clearly identify site boundaries. There are inconsistencies, for example Site C44 is described as Norwich Road but is labelled on the plan of Alternative sites as somewhere in the vicinity of Roughton Road. Draft Local Plan: Regarding the Preferred Site Options C07/2; C10/1; C16 and C22/1, all are identified as being preferred because: a) The site scores positively in the Sustainability Appraisal. However, in the Sustainability Appraisal, scoring positively applies to many other Cromer sites, including those not identified as Preferred Options, for example: C11; C18; C19; C19/1; C34; C44. As well as the scoring positively being frequent in the SA, the summary assessment of positive etc. in the SA is not always consistent with the colour bars shown see detailed comments on SA above. b) This is considered to</p>

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>be one of the most sustainable and suitable of the Cromer alternatives. However, detailed analysis of the Development Site Methodology Background Paper shows all of the Preferred Sites have sustainability issues, and therefore there is no justification for this statement. Issues include:</p> <p>Site 10/1 not in walking distance of schools and has flooding risk Site C16 is over 1.3 km from train station; is closest to the SAC/SSSI; and has risk of flooding and contamination Site C22/1 requires construction of new footbridge and roundabout in order to be considered suitable; and there are large mature trees along the road from which access is proposed; is visible from the south and immediate surrounding area; and risk of surface water flooding.</p> <p>Site ref C22/1 is identified in the Alternatives for housing only. The Background Paper 6 also identifies the Proposed Use as Housing. However in the Methodology Paper Conclusion site C22/1 is identified a suitable for allocation for sports pitches and facilities. If a need for sports pitches and facilities has been established, this should have been considered for other sites. There is, however, no such consideration shown in the Draft LP: Alternatives Considered. The comments made in the Why it is preferred and Why it is not preferred columns reflect the comments made in Site Methodology Background Paper. We have attached detailed comment on the Site Methodology which identifies inaccurate information; unjustified statements; and inconsistencies. Therefore these comments apply also to the Alternatives Considered, and raise doubt about the site selection process and outcome.</p> <p>Site C44 provides an example of these issues. It is described as having a number of constraints, however our detailed analysis of the Site Selection Background Paper 6 shows this not to be the case. The Background Paper 6 suggested the site name as Norwich Road yet identifies it as being off Roughton Road. Development is suggested as extending into the open countryside, yet the site does not extend as far south as the site C22/1 which is identified as a preferred option. The statements regarding the effect on the quality of the landscape, rural character and AONB are shown to be unjustified. The site is in walking distance to a range of schools, services and facilities and in close proximity to Roughton Road railway station. Furthermore, we note that site C44 was proposed for mixed use yet the assessment does not refer to any other uses than housing on the</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>site. The Alternatives merely comments that The preferred sites can deliver sufficient housing for Cromer. • There is no consideration of the other uses for which the site has specifically been proposed in the site nominations. We suggest that C44 offers an available and deliverable mixed use site offering housing, sporting and care facilities for Cromer, and that it has not been appropriately assessed in the LP process.</p>	
Cromer	C44	Duncan, Mr Phillip (1217309)	LP419	Object	<p>1. Inconsistency. This site is labelled as “Norwich Road” but the map in the Alternative sites document considered shows C44 it as located off the Roughton Road – but without any clear boundaries. It is assumed from other references to be the site subject to planning application PO/18/1551.</p> <p>2. Inaccurate information used in the assessment: a) The “informal path” identified in the C19/1 assessment is in fact a Public Right of Way b) Site owner confirms there are is no drain running through part of the site 3. Site description “There are mature trees on the western boundary” ignores the fact that part of the western boundary is the woodland known as Larners Plantation. Furthermore, there is no mention of the roadside and other field boundary hedgerows or of Becketts Plantation on the Eastern boundary (described in C22/1 assessment as woodland). 4. Site is described as wrapping behind existing housing and also protruding beyond “into the open countryside”. This is also true of Site C22/1 (which is identified as Preferred), which is identified as being visible from the south, yet “shouldn’t have a detrimental impact on the landscape and wider countryside” .There is therefore inconsistency between site assessments. 5. The conclusion suggests that the site has a number of constraints but this is inconsistent with the site description. 6. There is no reasoning or justification for the statement in the conclusion that the site would adversely affect the settlement. The site adjoins existing development 7. The conclusion suggests there would be “a negative effect on the quality of the landscape by reducing the rural character and extending into the open countryside and would have a greater material impact on the AONB than the preferred sites.” There is no evidence for this, particularly as it is acknowledged that the western part of site C44 is “visually well screened”; both C22/1</p>	<p>Comments noted: Consider amendments to the wording of key development considerations. Consider feedback in the finalisation of preferred sites.</p>

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					and C44 sites share the Becketts Plantation boundary; and Site C22/1 extends further south than C44. 8. The conclusion states C44 has poorer access to services and facilities (than what?), but there is no reasoning given, and this does not take account of C44 being within walking distance of infant, junior and high school and to the town centre with a range of services and facilities available; with bus stop nearby, and the site being one of the closest sites to Roughton Road station. 9. Site is identified as having "No flooding, utilities or contamination issues" . This does not apply to any of the sites identified as Preferred Sites.	

	Number Received	Summary of Responses (Alternatives Sites in Cromer)
Objection	15	A number of comments raised/repeated objections to the preferred sites being within the Local Plan due to the potential impact on the landscape and the coalescence between Cromer and Runton. Limited support is put forward for a number of the alternative sites, which are considered to be more suitable for development as they would not have the same negative impacts as the preferred sites. A number of objections are simply correcting information within the assessments.
Support	1	
General Comments	1	

Fakenham

Alternative Sites in Fakenham

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Fakenham	F02	Mr Olliffe & Shell Ltd (1216246 1216247)	AC051	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported F02. - Land Rear of Shell Garage, Creake Road has been assessed as being inappropriate for development as it cannot be satisfactorily accessed. This statement is simply not true. Shell Ltd has instructed TPA (Transport consultants) to undertake formal assessment of a new access into the site. It is clear that a suitable and safe access and egress can be delivered to the site and this has been discussed with North Norfolk Council through previous correspondence. Land Rear of Shell Garage would represent an appropriate rounding of the settlement and as with strategic allocation F03 (Land at Junction of A148 and B1146) there are no constraints to development of the site. As acknowledged within the Alternatives Considered consultation document, the only perceived constraint to suitability of the site is access. As this is not the case and can be proven to accommodate a safe and deliverable access (as per the supporting information prepared by TPA), it is considered the site is suitable, available and deliverable within the first 5 years of the Plan and should be included in the next consultation draft as a proposed allocation.	Comments noted: Support for alternative site F02. Consider feedback in the finalisation of preferred sites.
Fakenham	F07	Ms Clifton (1210087 1210089)	AC078	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported F07. - Site F07 Land East of Clipbush Lane relates to land controlled by Trinity College that was put forward for mixed use development in conjunction with the Call for Sites in 2016. It is noted that this site has been discounted on the basis that the preferred allocations (predominantly F01/B, plus two further sites providing a	Comments noted: Support for alternative site F07. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>further estimated 120 dwellings) will meet the town's housing requirements for the plan period. The report also states that the site is poorly integrated with the existing town and is very prominent within the landscape, with potential development resulting in a significant extension into the open countryside adversely affecting the character of the area. As noted above, the site immediately adjoins existing employment and residential areas (to the west and south respectively), and with the proposed significant expansion of the town to the north through the development of sites F01/A and subsequently F01/B, Site F07 has a clear and robust physical relationship with the existing settlement that makes it suitable for development. As such, the site is considered to offer the potential for development, including employment generating and retail uses, and those uses deemed acceptable within the countryside (as referred to in draft Policy Policy SD 4). It also offers potential for future residential development, should that be required in the longer term, given its physical relationship to existing residential areas and existing and proposed services and facilities to the west of the site. In considering the constraints to development noted in the consideration of alternatives report, it is also proposed that any visual and landscape impact resulting from development of the site (which is limited to specific locations rather than relevant to the overall site) could be appropriately addressed through careful consideration of the layout of development and associated landscaping.</p>	
Fakenham	F11	A & B Management Ltd Lanpro Services, Wilkinson, Ms Claire (1219336 1218057)	LP827	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Request that this site is allocated for residential use (from its current designated use as employment). A & B Management Services Limited have embarked on a comprehensive asset management strategy to maintain and enhance their vitality and viability. Looking at feasibility of development options for the site following the proposed relocation of the existing Aldiss Distribution Centre to another part of the town. The provision of housing in this location, within walking distance of the town centre, key services and facilities in Fakenham has the propensity to support existing uses and deliver a sustainable residential scheme to meet North Norfolk's local housing needs. Paragraph 68 of the Framework confirms that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. Paragraph 121 states local planning authorities should take a positive</p>	Comments noted: Consider alternative site proposed in finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Page 774					<p>approach in supporting proposals to use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the viability of town centres, and would be compatible with other policies in this Framework. The Council's Local Plan Background Paper 3, confirms that there is little employment land available within towns, with the exception of Fakenham (para 3.5). And confirms there is 9.44ha of available undeveloped land on designated employment areas and enterprise zones in Fakenham, demonstrating an overprovision of employment land. The Site is poorly related to the employment area (i.e. Fakenham Industrial Estate) to the north east and is located amongst residential areas. The entirety of the Site is under sole ownership and is considered to be deliverable within the next 5 years. The site has limited constraints. Access to healthcare opportunities and extensive range of comparison and convenience goods shopping in the town. Easy access to the national road network and good public transport links. The planning application for F01 has still not been determined and is unlikely to come forward and deliver 950 dwellings in the next 5-10 years to meet North Norfolk's local housing needs. Paper 2 states that there were 1,125 people on the housing waiting list who expressed a preference for living in Fakenham. This pressing need for new affordable homes can be addressed through the provision of a meaningful number of new dwellings at the proposed allocation site.</p>	
	Fakenham	F07	Trinity College Cambridge Define Planning & Design Clifton, Ms Kirstie (1210089 1210087)	LP591	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The policy identifies a relatively limited area of existing employment land (under 10ha) that has yet to be development within Fakenham and proposes no new allocations. Table 3 clearly indicates that Fakenham has delivered the highest quantum of employment development within the District and, as such, the town evidently attracts and supports employment growth in the District. This is reinforced in paragraph 13.5 of the draft Local Plan (Proposals for Fakenham), which notes that Fakenham has seen one of the strongest take-up rates of employment land within the District in recent years. Given the emphasis on the town to accommodate a large proportion of growth to reflect its status within the settlement hierarchy, and the scale of housing growth proposed within the draft Local Plan, there is a clear need to identify further employment land within or adjoining the town to support that growth potential. This could be accommodated through the broader development parameters for mixed</p>

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					use development on Land North of Rudham Stile Lane (Proposed Allocation F01/B that lies to the west of Water Moor Lane) and/or on Land East of Clipbush Lane (Site F07), which is currently discounted as one of the alternative sites considered for mixed use by the Council. Site F07 to the east of the town is particularly well located, being immediately adjacent to existing employment land. This site offers an opportunity to deliver employment generating uses, either as a single use or as part of a more extensive mixed use development and should be reconsidered in conjunction with a more detailed review of potential new employment land allocations for Fakenham. (Refer also to representations in response to Policy DS 6 and Alternatives Considered).	

	Number Received	Summary of Responses (Alternatives Sites in Fakenham)
Objection	4	A limited number of comments raised/repeated objections to the preferred site being within the Local Plan. Limited support is put forward for a number of the alternative sites, which are considered to be more suitable for development, primarily for reasons of deliverability. In some cases further information has been provided in order to seek to overcome the known constraints regarding the alternative sites.
Support	0	
General Comments	0	

Holt

Alternative Sites in Holt

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Holt	H10	Norfolk County Council: Norfolk Property Services (931093)	LP793	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Holt – Land off Swan Grove The site has not been included as a potential site for development within the draft Local Plan and has been allocated as an Open Land Area. NCC object to the open land area allocation as there would appear to be no demonstrably special justification for its inclusion and this would prejudice the potential to develop the site for a mixed-use scheme with both housing, formal open space and informal link to the town centre. NCC would therefore object to the Amenity Green Space allocation and would request it be deleted. The site has not been included as a potential site for residential development within the draft Local Plan. The site had been put forward by NCC for residential development following NNDC's 'Call for Sites' exercise, undertaken by the District Council in May 2016. Following this exercise, NNDC published its Housing and Economic Land Availability Assessment (HELAA) June 2007. As outlined in Appendix 4, NNDC HELAA (Part 1 Assessment of Housing Land) highlights that 'the site is considered suitable and available' for development. Furthermore, it states;</p> <p>'The site is well related to Holt, has access to facilities and utilities. No major constraints have been identified at this stage. However, development on the site would result in the loss of Open Space and replacement would be required. The site also falls within a moderate sensitive landscape on the edge of town and development proposals should reflect this (avoiding development, which affect or impinge on skyline views). Limited visibility of site from main road due to mature</p>	Comments noted: the site has been assessed as part of the potential sites for Holt and is not a preferred site. The site is currently designated as open land area in the adopted Core Strategy. Full details of the methodology used can be found in Background paper 2

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>hedgerow along boundary'.</p> <p>Whilst the HELAA does not allocate land for development, it does clearly identify land that has strong potential for allocation. In view of the above, the site continues to offer strong development potential. A mixed development could be provided which provides a mix of housing in a sustainable location, retains the woodland screen to north and east, provides part as a formal amenity use and includes a formal footpath route. The site is available for development with no significant constraints and could be delivered within the next five years.</p> <p>NCC would request that the land be reconsidered for residential development.</p>	
Holt	H27/1	Adams, Mr (1218558)	LP592	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: H27 The larger proposed site for mixed development at 14.15 Ha was considered unsuitable because."The site is not considered to be in a suitable location for residential development. The site would be a pronounced and obvious extension into the countryside and development of the whole site could have an adverse impact on the landscape. The site is adjacent to a Listed Building. The site is considered to have unsuitable highways access and network connections unless it is access via the new roundabout and spine road. The preferred sites can deliver sufficient housing for Holt.". H27/1 is the proposed use of the same reduced sized site for employment land and was considered a preferred option. - The same site has unsuitable highway access for private vehicles but not for commercial vehicles through a residential area. Housing is a pronounced and obvious extension into the countryside whereas industrial units are not. The development of the whole site could have an adverse impact on the landscape but it is actually very well screened and nowhere near as intrusive as the existing Heath Farm site. It's just how you spin it!. If the reduced site (H27/1 at 6 Ha) or even a slightly larger site to match H20 at 7.11 Ha was assessed for mixed use then the access to the A148 would be the same but would not include commercial vehicles. The extension into the countryside would be the same as for the employment land and no more of an extension than H20 which I consider to be equally an extension into the countryside. . The use of H27/1 or even a slightly enlarged area to match H20 as housing would bring all the benefits listed above. I cannot see any planning negatives to the swap</p>	Comments noted: Consider feedback in the finalisation of preferred sites.

	Number Received	Summary of Responses (Alternatives Sites in Holt)
Objection	2	Norfolk County Council object to the lack of inclusion of site H10 due to the open land designation. A member of the public raises support for site H27/1 and sets out that the reasons for the site not being preferred should be the same for site H27, which is preferred.
Support	0	
General Comments	0	

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Hoveton

Alternative Sites in Hoveton

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Hoveton	HV05	Norfolk Land Ltd Presslee, Mr A (1216618 1216614)	LP531	Object	Hoveton is identified as a 'Small Growth Town' in the proposed settlement Hierarchy, in which the Plan proposes "a more limited amount of additional development", together with Holt, Sheringham, Stalham and Wells-next-the-Sea. The draft Plan proposes just one new residential allocation of 150 dwellings (site HV01B). It is our contention that Hoveton is capable of sustainably accommodating additional housing growth through the emerging Local Plan, to which end Norfolk Land Ltd. puts forward a site on Horning Road, Hoveton for approximately 150 dwellings (including a possible Car Home) and public open space, in addition to that already identified in the draft Local Plan (HV01B), thereby increasing the overall housing allocation in Hoveton to approximately 300. The current Core Strategy – at Policy SS1 – identifies Hoveton as a secondary settlement, along with Sheringham, Stalham and Wells-next-the-Sea. Hoveton is acknowledged (in the current and draft Plans) as a sustainable settlement, and whilst it may be realistic to continue its position in the settlement hierarchy as a Secondary Settlement (now Small Growth Town) within an emerging North Norfolk Local Plan, in at least planning/cross-boundary/cooperation terms it ought to be considered in conjunction with Wroxham, with which it is physically, economically and socially 'conjoined'. Hoveton sits on the border of the Greater Norwich Housing Market Area (as identified in the Central Norfolk Strategic Housing Market Assessment) - in which Wroxham is located - and ought therefore to be more realistically considered in that context, or at least being given regard to insofar as the relative Housing Market Areas and OAN are concerned. Put	Noted. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
<p style="text-align: center; transform: rotate(-90deg);">Page 780</p>					<p>simply, Hoveton demands additional scrutiny given its somewhat different context – in these respects – than perhaps other similar settlements in North Norfolk, and ought to be accommodating a greater share of housing to meet identified needs, than is indicated in the Working Party report. Hoveton particularly promotes itself having: a substantial employment base; an excellent range of shops (including a supermarket); a primary school and high school; railway station with services to Norwich and Sheringham/Cromer; a newly constructed medical centre; and well placed for recreation. Combined with Wroxham and its significant employment, retail, recreation and other services/facilities, they offer significant economic and social dimensions to sustainably supporting a good level of new growth. Environmentally it is acknowledged that the area of the Broads is highly sensitive; however, our site is detached from this and sufficiently distant from the Broads area and its designations so as to avoid any material impacts (the HELAA acknowledges this). Other parts of Hoveton (and indeed Wroxham) are more environmentally constrained, and those (of the sites put forward in the respective Calls for Sites and discarded in the Alternatives Considered volume of the Draft Local Plan) which are not, are more distant from the centre and from other services/facilities, and thereby less sustainable in that respect. Compared with the Draft Plan’s focus for development in North Walsham and Fakenham, Hoveton is very much closer to Norwich and has excellent public transport links thereto (including a regular - hourly - train service, of 15 minutes duration). That proximity makes Hoveton an excellent housing market, with un-met demand. There is also excellent housing market demand in Hoveton, where strong/sustained demand will ensure early and continued delivery of housing to meet identified needs. We see considerable merit in having more than one site identified for allocation in Hoveton. The highways related work (and which we have submitted previously) identifies technical capacity for at least 350 additional dwellings at the Stalham Road/Horning Road mini-roundabout junction, subject to some minor engineering alterations. We strongly believe that the intended limited growth for Hoveton merits, indeed warrants, re-assessment, in light of the above/below, and where the settlement scores well in any sustainability and services matrix. Norfolk County Council Education Department has confirmed that the additional housing we propose in Hoveton is achievable with regard to school places: St John’s</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>Primary has scope for an additional form of entry and NCC has plans for expansion of Broadland High School. This is acknowledged in the Draft Local Plan (paragraph 15.10). Norfolk Land Ltd. has a legal agreement with the landowner to promote and develop the site in question for housing and related uses. Norfolk Land has a track record in this regard and has a clear intention to seek planning permission for the site and to provide houses at the earliest opportunity, assisting North Norfolk District Council in meeting its housing delivery obligations. Given the clear intention to provide sufficient land in the Local Plan together with sufficient flexibility to provide additional land concurrent with and/or thereafter, it makes greater sense to 'build in' said flexibility/choice into the Plan-making process through the allocation of housing sites. Our site - when viewed in the context of combined accessibility to services/facilities – ought to be the most favourably located. It is a short walk to St John's Primary School, the Medical Centre and Recreation Ground/Village Hall and a shorter walk to shopping and related facilities than the draft allocated site (HV01/B). The proximity of the site to St John's Primary School (just 75 metres at the nearest point) increases the likelihood - compared to the other sites - of residents/children walking rather than driving to school, thus minimising or at least reducing the prospect of exacerbating the existing, well-documented parking/drop off/pick up problems thereof. Furthermore, it appears that insufficient consideration has been made – in undertaking the relative assessments of sustainability - of the recent grant of planning permission for commercial development immediately to the north (PF/16/0733), or that to grant planning permission for construction of 25 no. dwellings, church car park and graveyard extension on land to the south of Horning Road (PF/17/1802). These developments will change the context of our site – in landscape and other sustainability terms, not least the setting of the heritage assets – and ought to be given proper consideration and amended Sustainability Appraisal scoring accordingly. The Indicative Masterplan accompanying this representation illustrates how the site can be developed for approximately 150 dwellings (possibly including a care home) and public open space in a way so as to address the particular 'negative' scoring relating to landscape and heritage assets. It also illustrates how development of the site would be undertaken in relation to existing and approved development – notably the FW Properties developments south of Horning Road (25 houses) and extension</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					to Stalham Road Industrial estate (employment) (see above). In addition, it shows how the landscape, heritage and ecological resources can be protected/enhanced through design and proposed extensive landscaping and new woodland planting, as well as more formal public open space.	

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	Number Received	Summary of Responses (Alternatives Sites in Hoveton)
Objection	1	It is argued that Hoveton can take more development and a new site is proposed as an alternative to the preferred site within the Local Plan. This alternative site can be delivered in conjunction with the existing preferred site.
Support	0	
General Comments	0	

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North Walsham

Alternative Sites in North Walsham

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
North Walsham	NW15	Mr Ditch Mr Lambert (Bidwells) (1217212 1217147)	AC063	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported - Object to the exclusion of the site. This response seeks to promote a smaller element of the site, as identified by the attached site location plan, for residential development. The site is well suited for a proportionate residential development, and provides a unique opportunity to deliver much-needed single-storey housing. The principal amendment is that the scale of the site has been reduced to 2.2ha so that it is more congruous with the surrounding area, and can be delivered from Bradfield Road, using land within our client's ownership	Comments Noted: Support for alternative site NW15. Consider feedback in the finalisation of preferred sites.
North Walsham	NW16	Mr Collins & Richborough Estates (1217387 1217389)	AC080	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported NW16. The Paston Gateway site (ref. NW16) comprises 14.13 hectares of agricultural land located on the northern edge of North Walsham in between Mundesley Road, Swafield Rise, Acorn Road and Wharton Drive to the south and Little London Road to the north. To the south-west there is Mundesley Road with the Paston Way public footpath to the north-west and agricultural fields to the east. The site is in single ownership, other than a strip of Norfolk County Council-owned land on the western boundary which is required to facilitate access. Discussions regarding use of this land are ongoing between the parties. The Illustrative Masterplan (drawing ref. n1143.006.C) which accompanies these representations details the following in respect of the proposed layout of the site: Approximately 330 new dwellings; Primary access via a new roundabout junction off the B1145 with a secondary	Comments noted: Support for alternative site NW16. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>access from Mundesley Road and a pedestrian, cycle and emergency access from Acorn Road; Creation of 5 hectares of public open space within the northern part of the site which will include new public footpaths and areas of play for older and younger children; Landscaping buffer for properties to the south; Opportunities for a community-use focused building plus a cadet facility within the site; Balancing ponds for the management of surface water drainage; Partial restoration of historic hedgerows. The evolution of this Illustrative Masterplan is discussed in detail in the Vision Document which accompanies these representations, and is informed by detailed surveys and assessments in respect of landscape and visual matters, arboricultural impacts, flood risk, drainage and utilities, transport and access, heritage, archaeology and ecology. This sets out not only the deliverability of the proposed development, but also its suitability to accommodate the scale of housing proposed and the potential benefits it would deliver to the local community. Paston Gateway is one of the alternatives which were considered by the LPA in the preparation of LPP1 and within the "Alternatives Considered" document (ref. NW16), page 68.</p> <p>In view of the reasons given by the LPA for excluding the site from LPP1, each point is taken in turn below, with additional information provided in respect of potential impacts on trees and heritage matters: The site is reasonably remote from the town centre and services. The site is less than 1 mile from Market Place which is the centre of the town centre and is accessible within a 5-minute car journey, a 20-minute walk or a 6-minute bus ride via the CH2 service from Lyngate Road which is itself a 6-minute walk from the site. Furthermore, the Sainsbury's supermarket on Mundesley Road is only 0.6 miles from the site which can be accessed via a 2-minute car journey or an 11-minute walk. In the Interim Sustainability Appraisal for LPP1 the site was assessed and in respect of social and economic factors the appraisal states: Social scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic scores positively, edge of settlement, good access to employment, services/facilities, transport links, access to educational facilities, high speed broadband in vicinity. Town centre easily accessible from the site. (page 415) It is therefore evident from the Council's own</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Page 786					<p>evidence base that the site is not remote from the town centre or services and is indeed easily accessible to the town centre and services necessary for a development of this scale and nature. This is supported further by the Access Appraisal prepared by Hub Transport in support of these representations, which provides an overview of the local highway network, suitability of the proposed access arrangements and accessibility of the site to a wide range of local services and facilities see in particular Table 2 on page 10 of the Access Appraisal. It should also be noted that the proposed development, due to its close proximity, would support the existing services, facilities and businesses in the town centre and would therefore help sustain the long-term viability of the town centre. Accordingly, and as supported by the LPA's own evidence base, this is not a reason which can be used to justify the site not being included in LPP1. It would be an extension into open countryside and could have an adverse impact on the landscape. The site, by the nature of the proposed development, would extend the settlement boundary of North Walsham, but it should be noted the extent of development would be less than is proposed at the Norwich Road and Nursery Drive site and significantly less than at the North Walsham Western Extension. Indeed, development of greenfield sites will inevitably be required in order to meet development needs for both the town and the District. In order to consider the specific impacts of development on this site, a detailed Landscape and Visual Overview has been prepared by Tyler Grange, and is submitted with these representations. It concludes that the development of the site has the potential to respond to the policy aspirations of the North Norfolk adopted local plan, published landscape character assessment and site specific analysis through the retention of characteristic boundary planting, enhancements to internal landscape structure and a soft transition to the wider countryside to the north of the site. The development of the site would see the retention and enhancement of the majority of the existing landscape structure within the site with opportunities to reinstate historic internal hedgelines and increased green corridors across the site. Limited areas of existing tree planting found at the site's western boundary would require removal to accommodate for the new access into the site. Where tree loss cannot be avoided, replacement trees would be planted within the site to provide suitable mitigation, and existing tree belts strengthened. These proposed</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>trees would be deciduous and would include specimen Oak parkland trees proposed in the northern open space to mitigate for any potential losses, with the potential to provide a net increase in tree cover.</p> <p>Retention of open space at the northern part of the site would provide a soft transition to the north and a softer settlement edge than currently exists, which would assist in retaining a transitional landscape between the settlement edge of North Walsham and the wider landscape to the north. A softer edge will improve the existing abrupt settlement edge and improve its current harsh character and appearance. Additional footpath routes through this landscape to link to the wider network of footpaths and the Paston Way will also assist in increasing recreational opportunities, as well as providing increased provision for green infrastructure. Visually, the development of the site is likely to have localised impacts, with short distance views possible from the surrounding network of roads, the existing residential development to the south, and the existing network of public footpaths. The site will, however, be viewed in the context of the existing settlement edge and the treatment of the new settlement edge should provide a soft transition to the wider more rural land to the north of the site and would be beneficial to the character and appearance of the area. Overall, the site has capacity to absorb development with a landscape-led response which will comply with the adopted policies found in the North Norfolk Adopted Local Plan and will respond positively to the landscape character and visual matters without causing undue harm to the character and visual amenity of the site and its surroundings. Accordingly, this is not a reason which can be used to justify the site not being included in LPP1. Highways access and the local network are considered to be unsuitable. The Illustrative Layout (drawing ref. n1143.006.C) which accompanies these representations demonstrates that a new primary access from the B1145 is feasible with secondary access from an extension to Mundesley Road. The primary access would significantly reduce the volume of traffic using the Mundesley Road route into the town centre with the B1145 route a similar travel time (1 or 2 minutes difference). In addition, the proposed roundabout access onto the B1145 would be used to travel beyond North Walsham to Cromer or Norwich. This new access solution has been prepared to address concerns raised previously, particularly during the public consultation exercise undertaken by Richborough Estates, and is</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>considered in detail in the Access Appraisal from Hub Transport which accompanies these representations. The preferred sites can deliver sufficient housing for North Walsham As detailed in these representations, the preferred North Walsham Western Extension site is not anticipated to deliver a sufficient proportion of its potential 1,800 dwellings within the plan period to meet housing requirements. In particular, any reductions or delays to the delivery of the North Walsham Western Extension or other allocations would leave the LPA with either no flexibility, or even a shortfall, in delivering the OAN requirement for 10,860 new homes in the District over the Plan period. The LPA are therefore in need of additional sites to deliver the homes required for the District over the Plan period. Arboricultural impacts An Arboricultural Technical Note has been prepared by Tyler Grange and is submitted with these representations. It confirms that there are currently no Tree Preservation Orders administrated that could be affected by development on the site and none of the trees surveyed are considered to be ancient or veteran in terms of age class. The removal of several moderate value trees will be unavoidable, including some from two higher value tree groups, to accommodate the access requirements and facilitate the improved access to the Paston Way recreational route. The development area itself is unconstrained by existing trees as they are contained to the site's boundaries. The expected losses to accommodate the overall development are therefore localised at the access, which allows for the development to provide a proportionate degree of new tree planting to compensate for the expected tree loss. A large area of Open Space to the north of the development will deliver substantial new tree planting and historic hedgerows no longer present will be partly reinstated. It is therefore reasonable to expect that a net-gain in tree cover could be achieved through this scheme in the long-term. Assuming the delivery of appropriate compensatory planting in response to the proposed western boundary tree loss, and the safeguarding of retained high quality trees at the site boundaries, the principle of development on the Paston Gateway site is considered feasible on arboricultural terms and demonstrates accordance with local planning policy where it relates to existing trees. Heritage impacts Subject to the incorporation of appropriate mitigation measures, there are no built heritage constraints to the development of the site. There is also no suggestion that the site is likely to contain</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					archaeological remains that are nationally important, that would prohibit development or require to be designed around, and there are no archaeological constraints to development of the site that would need to be resolved in advance of allocation. Any future planning application would be supported by an updated archaeological desk-based assessment and geophysical survey, followed by intrusive evaluation, if required. Summary It is clear from the above that the reasons given by the LPA in the "Alternatives Considered" document cannot be used to justify the exclusion of the site from LPP1. The site is accessible to town centre and services, will mitigate impacts on the landscape, is suitably accessible from the main highway and will help deliver homes needed to meet the OAN of the District over the Plan period. In order to be sound in accordance with paragraph 35 of the Framework, the LPA should include the Paston Gateway site as an allocation for around 330 new dwellings during the Plan period.	
North Walsham	NW20	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	Comments noted. The response supports the identification of NW20 as a non preferred site
North Walsham	NW20	Mr Witham (1216498)	AC069	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North Walsham	NW21	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement	Comments noted. The response supports the identification of NW 21 as a non preferred site

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	
North Walsham	NW21	Mr Witham (1216498)	AC069	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North Walsham	NW22	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	Comments noted. The response supports the identification of NW22 as a non preferred site
North Walsham	NW22	Mr Witham (1216498)	AC069	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North Walsham	NW23	Mr Witham (1216498)	AC068	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North Walsham	NW23	Mr Hewett (1210813)	AC058 AC059	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported NW23. We object to the exclusion of this site. Taylor Wimpey are actively seeking to promote the land for	Comments noted: Support for alternative site NW23. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>residential allocation. It is considered that the allocation of this site for development would have a number of positive benefits, including the provision of much needed housing. With appropriate masterplanning and design, the site is capable of delivering a sensitively designed, but comprehensive and well-connected sustainable development that could contribute to the local development needs of the District in the early part of the plan period. A Concept Masterplan is attached which illustrates how the following can be delivered: The Site Boundary measures 18.35ha which would accommodate up to 420 dwellings at 35dph. One indicative vehicular access point has been shown off Yarmouth Road, providing access to the potential development parcels. A potential emergency vehicular access point has been shown off Thirlby Road. An opportunity for new tree and/or woodland planting has been shown along the southern boundary of the Site in order to create a soft landscaped edge. Due to the number of dwelling proposed in total on Site's NW23, NW24 and 43, we have indicated the potential for a number of new community facilities, which may be required to support a development of this size: 1. Land for a primary school - Whilst not specifically referenced on the plan, it is understood that this is required to mitigate the growth planned for the town. 2. A convenience store 2. A community hall 3. New allotments 4. Tennis courts (in order to fulfil an element of sporting provision) 5. A MUGA This site should be included as an allocation to provide a better range of sites in the town as currently the bulk of future growth is dependent on the delivery of the western relief road. Delays to housing delivery is frequently caused by the need to deliver large infrastructure and the associated cost burden that these major projects bring. This is further complicated by the added uncertainty of bringing together multiple sites in several ownerships. The growth strategy and the soundness of the Plan is put at risk without the flexibility of other allocated sites in North Walsham which can deliver early housing completions. This has been seen elsewhere in Norfolk, such as at Attleborough where the delays to bringing forward the SUE for 4,000 homes and link road to the south of the town has resulted in the Council being unable to demonstrate a 5 year housing land supply for many years.</p>	
North Walsham	NW24	Mr Witham (1216498)	AC068	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town	Comments noted: Supports Assessment of the site.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	
North Walsham	NW24 & NW43	Mr Hewett (1210813)	AC058 AC059	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Alternative Site is supported NW24 & NW43. We object to the exclusion of this site. Taylor Wimpey are actively seeking to promote the land for residential allocation. It is considered that the allocation of this site for development would have a number of positive benefits, including the provision of much needed housing. With appropriate masterplanning and design, the site is capable of delivering a sensitively designed, but comprehensive and well-connected sustainable development that could contribute to the local development needs of the District in the early part of the plan period. A Concept Masterplan is attached which illustrates how the following can be delivered: The Site Boundary measures 18.35ha which would accommodate up to 420 dwellings at 35dph. One indicative vehicular access point has been shown off Yarmouth Road, providing access to the potential development parcels. A potential emergency vehicular access point has been shown off Thirlby Road. An opportunity for new tree and/or woodland planting has been shown along the southern boundary of the Site in order to create a soft landscaped edge. Due to the number of dwelling proposed in total on Site's NW23, NW24 and 43, we have indicated the potential for a number of new community facilities, which may be required to support a development of this size: 1. Land for a primary school - Whilst not specifically referenced on the plan, it is understood that this is required to mitigate the growth planned for the town. 2. A convenience store 2. A community hall 3. New allotments 4. Tennis courts (in order to fulfil an element of sporting provision) 5. A MUGA This site should be included as an allocation to provide a better range of sites in the town as currently the bulk of future growth is dependent on the delivery of the western relief road. Delays to housing delivery is frequently caused by the need to deliver large infrastructure and the associated cost burden that these major projects bring. This is further complicated by the added uncertainty of bringing together multiple sites in several ownerships. The growth strategy and the soundness of the Plan is put at risk without the flexibility of other allocated sites in North Walsham which can deliver early housing completions. This has been seen elsewhere in Norfolk, such as at Attleborough where the delays to bringing forward the SUE for 4,000</p>	Comments noted: Support for alternative site NW24 & NW43. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					homes and link road to the south of the town has resulted in the Council being unable to demonstrate a 5 year housing land supply for many years.	
North Walsham	NW33	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	Comments noted. The response supports the identification of NW33 as a non preferred site
North Walsham	NW33	Mr Witham (1216498)	AC069	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North Walsham	NW34	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	Comments noted. The response supports the identification of NW34 as a non preferred site
North Walsham	NW34	Mr Witham (1216498)	AC069	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North	NW42	Miss Philcox	AC002	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:	Comments noted: Supports the

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Walsham		(1210047)			Supports Assessment of the site. I support the Council's apparent rejection of proposals for housing development in the above areas of North Walsham and the immediate surroundings. This area is not the easiest from which to access the town by road, and is rich in environmental value, quiet, beautiful, and with a real sense of community. Sadler's Wood and its surrounding area of farmland is a real asset for the town, and widely used by walkers. To improve facilities for walkers, cyclists and visitors, the area of Manor Road south of Anchor Road and up to the junction with the Happisburgh Road at White Horse Common might even be designated a Quiet Lane to link with Holgate Road and the Weavers' Way. This could reduce the risks for pedestrians currently walking into or from the town along the busy/dangerous Happisburgh Road by offering an alternative route. To extend this, a permissible footpath might be created on farmland adjoining the Happisburgh Road, from the junction with Meeting Hill Lane, to link through to Ebridge Mill, the canal and Witton Woods, thereby improving the amenity/tourism value of the area by creating a safe circular route for walkers, and linking in with the many other footpaths in the area.	assessment of the proposed preferred sites in the Local Plan.
North Walsham	NW43	Mr Witham (1216498)	AC068	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The draft is correct to exclude these sites. These sites are indeed remote from, and poorly linked to, the town centre, and each would pose damaging intrusions into the open countryside surrounding this market town.	Comments noted: Supports Assessment of the site.
North Walsham	NW50	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	Comments noted. The response supports the identification of NW50 as a non preferred site
North Walsham	NW50	Miss Philcox	AC002	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. I support the Council's apparent	Comments noted: Supports the assessment of the proposed preferred

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Walsham		(1210047)			rejection of proposals for housing development in the above areas of North Walsham and the immediate surroundings. This area is not the easiest from which to access the town by road, and is rich in environmental value, quiet, beautiful, and with a real sense of community. Sadler's Wood and its surrounding area of farmland is a real asset for the town, and widely used by walkers. To improve facilities for walkers, cyclists and visitors, the area of Manor Road south of Anchor Road and up to the junction with the Happisburgh Road at White Horse Common might even be designated a Quiet Lane to link with Holgate Road and the Weavers' Way. This could reduce the risks for pedestrians currently walking into or from the town along the busy/dangerous Happisburgh Road by offering an alternative route. To extend this, a permissible footpath might be created on farmland adjoining the Happisburgh Road, from the junction with Meeting Hill Lane, to link through to Ebridge Mill, the canal and Witton Woods, thereby improving the amenity/tourism value of the area by creating a safe circular route for walkers, and linking in with the many other footpaths in the area.	sites in the Local Plan.
North Walsham	NW50	Mr Witham (1216498)	AC067	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. I agree with the proposal to exclude these sites	Comments noted: Supports Assessment of the site.
North Walsham	NW52	Mr Robotham (1210285)	AC004	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported NW52. Although this site has not been given allocation for mixed use we consider it is still suitable for employment use only and would like this to be considered. With regard to highways concerns access can be provided through our adjoining land off the existing Cornish Way Business Park roadway avoiding the issue with Bradfield Road and creating a natural extension to the existing land used for employment purposes.	Comments noted: Support for alternative site NW52. Consider feedback in the finalisation of preferred sites.
North Walsham	NW54	Mr Gleeson (1215806)	AC008	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I would like to express the support of my family and I for the decisions made in respect of sites NW20, NW21, NW22, NW33, NW34, NW50 and NW54. Any development of these sites would clearly represent an extension into open countryside as they are outside the settlement boundary. The decisions made, in respect to these sites, are very sensible and, I believe, would have the support of all residents of Spa Common	Comments noted: The response supports the identification of NW54 as a non preferred site

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					save for those who would propose to tear up the fabric of our natural environment for the sole purpose of personal enrichment whilst ensuring that their own habitat remains unaffected.	
North Walsham	NW54	Miss Philcox (1210047)	AC002	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. I support the Council's apparent rejection of proposals for housing development in the above areas of North Walsham and the immediate surroundings. This area is not the easiest from which to access the town by road, and is rich in environmental value, quiet, beautiful, and with a real sense of community. Sadler's Wood and its surrounding area of farmland is a real asset for the town, and widely used by walkers. To improve facilities for walkers, cyclists and visitors, the area of Manor Road south of Anchor Road and up to the junction with the Happisburgh Road at White Horse Common might even be designated a Quiet Lane to link with Holgate Road and the Weavers' Way. This could reduce the risks for pedestrians currently walking into or from the town along the busy/dangerous Happisburgh Road by offering an alternative route. To extend this, a permissible footpath might be created on farmland adjoining the Happisburgh Road, from the junction with Meeting Hill Lane, to link through to Ebridge Mill, the canal and Witton Woods, thereby improving the amenity/tourism value of the area by creating a safe circular route for walkers, and linking in with the many other footpaths in the area.	Comments noted: Supports the assessment of the proposed preferred sites in the Local Plan.
North Walsham	NW55	Miss Philcox (1210047)	AC002	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. I support the Council's apparent rejection of proposals for housing development in the above areas of North Walsham and the immediate surroundings. This area is not the easiest from which to access the town by road, and is rich in environmental value, quiet, beautiful, and with a real sense of community. Sadler's Wood and its surrounding area of farmland is a real asset for the town, and widely used by walkers. To improve facilities for walkers, cyclists and visitors, the area of Manor Road south of Anchor Road and up to the junction with the Happisburgh Road at White Horse Common might even be designated a Quiet Lane to link with Holgate Road and the Weavers' Way. This could reduce the risks for pedestrians currently walking into or from the town along the busy/dangerous Happisburgh Road by offering an alternative route. To extend this, a	Comments noted: Supports the assessment of the proposed preferred sites in the Local Plan.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					permissible footpath might be created on farmland adjoining the Happisburgh Road, from the junction with Meeting Hill Lane, to link through to Ebridge Mill, the canal and Witton Woods, thereby improving the amenity/tourism value of the area by creating a safe circular route for walkers, and linking in with the many other footpaths in the area.	
North Walsham	NW60	Mr Witham (1216498)	AC067	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. I agree with the proposal to exclude these sites	Comments noted: Supports Assessment of the site.

	Number Received	Summary of Responses (Alternatives Sites in North Walsham)
Objection	6	A limited number of comments have been made in regard to alternative sites NW15, NW16, NW23, NW24, NW43, and NW52. It is proposed that site NW15 should be reduced in size and re-assessed accordingly and that site NW52 should be re-assessed on the basis of being employment only. Sites NW23, NW24 and NW43 have all been put forward by Taylor Wimpey who set out that if the sites were to be delivered collectively a number of community benefits could be offered including a shop, community hall, allotments, tennis courts and a MUGA. The argument is also made that these sites are available, deliverable and achievable and would come forward in a much shorter time than the proposed western extension. The assessment of NW16 is disputed and additional information has been submitted to demonstrate that the site is a sustainable option. The majority of comments are in support of the assessment of alternative sites that have not been selected as proposed preferred sites in the Local Plan.
Support	21	
General Comments	0	

Sheringham

Alternative Sites in Sheringham

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Page 798 Sheringham	SH16/1	Norfolk County Council: Norfolk Property Services (931093)	LP739	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Disagree with assessment and non-inclusion as a preferred site. NPS consider that the site is located in a sustainable location in close proximity to the town centre. The provision of residential development would allow a logical extension of the settlement boundary to allow growth in the town. There is also potential to provide a housing development with a notable care focus in this location. Although the site was identified in the Housing and Economic Land Availability Assessment (HELAA) June 2017 as a less constrained site for residential use with no significant site constraints, the First Draft Local Plan (Part 1) Alternatives Considered did not consider the site suitable for development as the site is in an; • Elevated position which is visible in the landscape; • Development would extend into the countryside and have a negative effect upon the quality of the landscape; • It could have an impact on the heritage assets to the south of the site. Having reviewed the site appraisal, NPS do not believe the site context has been fully considered in relation to landscape impact. Although the site is in an elevated position with a moderate fall in height from north to south, the land has residential development to the west and north boundary and a railway line to the south. Therefore, any new housing development would not result in a significant break out into the open countryside or have a negative impact upon the landscape, as there would be more elevated development to the north of the site. The proposal would allow a logical extension of the settlement boundary and could provide much-needed	Comments noted: The site has been assessed as part of the potential sites for Sheringham and is not a preferred site.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response	
Page 799					housing development with a care focus. With regard to heritage assets to the south of the site, these are located on the opposite side of the railway line and would not be affected by residential development. The land off Nelson Road SH16/1 is also considered more suitable for development than NNDC proposed site, on land South of Butts Lane SH18/1B. Land South of Butts Lane SH18/1B is located within an Area of Outstanding Natural Beauty and forms part of the setting of Sheringham Park and Conservation Area (see Core Strategy Proposals Map). The development of this land would have a greater impact upon an important landscape area in comparison to land off Nelson Road, which has no environmental or landscape designations. It would also result in a significant break out into the open countryside with existing development on only one boundary. The land South of Butts Lane also appears to have a constrained access and is likely to result in more ecological impacts as it would remove an agricultural land buffer between residential development and a large woodland area. Although land south of Butts Lane is considered to be well located to services and schools, the site is on the edge of Sheringham and a considerable distance from services and facilities in the town centre. Land off Nelson Road is much closer to the town centre and more sustainable. NCC would, therefore, object to site allocation Land South of Butts Lane SH18/1B and request land off Nelson Road SH16/1 be reconsidered for development		
	Sheringham	SH18/1A	Ms Gill (1215702)	AC007	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. Alternative sites SH18/1A, SH18/2, SH19, these would be highly visible in the landscape, development would encroach into the countryside and reduce rural character and any development would greatly impact within an AONB. Please note sites SH18/1A and SH18/2 are in the Parish of Upper Sheringham	Comments noted: Supports Assessment of the site. Please note sites SH18/1A and SH18/2 are in the Parish of Upper Sheringham
	Sheringham	SH18/2	Ms Gill (1215702)	AC007	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. Alternative sites SH18/1A, SH18/2, SH19, these would be highly visible in the landscape, development would encroach into the countryside and reduce rural character and any development would greatly impact within an AONB. Please note sites SH18/1A and SH18/2 are in the Parish of Upper Sheringham	Comments noted: Supports Assessment of the site. Please note sites SH18/1A and SH18/2 are in the Parish of Upper Sheringham

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Sheringham	SH19	Ms Gill (1215702)	AC007	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. Alternative sites SH18/1A, SH18/2, SH19, these would be highly visible in the landscape, development would encroach into the countryside and reduce rural character and any development would greatly impact within an AONB. Please note sites SH18/1A and SH18/2 are in the Parish of Upper Sheringham	Comments noted: Supports Assessment of the site. Please note sites SH18/1A and SH18/2 are in the Parish of Upper Sheringham
Sheringham	SH23	Mr Wright (1216657)	AC060	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objecting to the Assessment. I would like to support this alternative site. This site is rightly proposed as housing. The site is located within the town centre of Sheringham and is therefore located in a highly accessible location. A significant number of services and national transport links are located within walking distance of the site. Local businesses will also benefit economically as much daily shopping/services will be in the town. The central theme of the NPPF is the presumption in favour of sustainable development, described as the 'golden thread' running through both plan making and decision-taking and local authorities should recognise that residential development can play an important role in ensuring the vitality of town centres and encourage development on appropriate sites. The site utilises a brownfield site which is one of the principles which sits at the heart of the NPPF. NB: Contrary to what is stated in the Draft Local Plan the site is available during the plan period.	Comments noted: Support for alternative site. Consider feedback in the finalisation of preferred sites.

Parish & Town Councils	Number Received	Summary of Responses (Alternatives Sites in Sheringham)
Objection	3	A number of comments have been made in support of the assessment of alternative sites that have not been selected as proposed preferred sites in the Local Plan. The assessment of SH16/1 is disputed and the site is considered to be in a sustainable location than the preferred sites. Site SH23 is supported as a brownfield site that is well located to the town. SH07 should be re-assessed for residential use.
Support	3	
General Comments	0	

Stalham

Alternative Sites in Stalham

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Stalham	ST17	Broads Authority (321326)	LP806	Support	We support the reasons for not taking this site forward.	Comments noted.

Page 801	Number Received	Summary of Responses (Alternatives Sites in Stalham)
Objection	0	Support for the assessment of the site as an alternative within the plan.
Support	1	
General Comments	0	

Wells-next-the-Sea

Alternative Sites in Wells-next-the-Sea

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Wells	W05	Mr Fennell (1217420)	AC073	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W05. Homes for Wells agrees with the reasoning behind the decisions not to prefer any of the alternative sites.	Comments noted: Supports Assessment of the site.
Wells	W06	Mr Fennell (1217420)	AC073	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W06. Homes for Wells agrees with the reasoning behind the decisions not to prefer any of the alternative sites.	Comments noted: Supports Assessment of the site.
Wells	W06/1	Dr Griffiths (1210766)	AC005	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I wish to add my support and additional comments to the opinion made by the planning team for proposed alternative site W06/1. I was reassured to see that this site was not considered appropriate and strongly agree that any housing development would be detrimental to the town. Any development would compromise the important business of the port and local fishing industry. As part of the open countryside and important area of outstanding natural beauty, the mix of industrial port and fishing activities, with leisure boats and yachts is a key aspect of the heritage and charm of Wells-next-the-sea. Locals and visitors alike would be adversely impacted by any new development in this special place right at the interface of East Quay and the beautiful open countryside of the coast path	Comments noted: The response supports the identification of W06/1 as a non-preferred site

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					beyond.	
Wells	W06/1	Mrs Griffiths (1210796)	AC006	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Support decisions made in respect of sites W06/1. In addition to the obvious flood risk, it would interfere with the important local businesses of the fishing industry and harbour. It would also put at risk pedestrians and users of the slipways, particularly with the inevitable additional traffic congestion. As part of the open countryside and an important area of outstanding natural beauty, the mix of industrial port and leisure boats forms an important part of the heritage of the town. Building houses in this small area would be of significant detriment to the environment. It is also outside the current settlement boundary.	Comments noted. The response supports the identification of W06/1 as a non-preferred site
Wells	W07	Mr Fennell (1217420)	AC073	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W07. Homes for Wells agrees with the reasoning behind the decisions not to prefer any of the alternative sites.	Comments noted: Supports Assessment of the site.
Wells	W08	Mr Fennell (1217420)	AC073	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W08. Homes for Wells agrees with the reasoning behind the decisions not to prefer any of the alternative sites.	Comments noted: Supports Assessment of the site.
Wells	W09	Mr Fennell (1217420)	AC073	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W09. Homes for Wells agrees with the reasoning behind the decisions not to prefer any of the alternative sites.	Comments noted: Supports Assessment of the site.
Wells	W10	Mr Fennell (1217420)	AC073	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W10. Homes for Wells agrees with the reasoning behind the decisions not to prefer any of the alternative sites.	Comments noted: Supports Assessment of the site.
Wells	W11	Wells Town Council (1212319)	LP098,LP108	General Comments	The Council wishes to draw to the attention of the District Council the possible use of an inner northern strip, adjacent to the High School playing fields, of the Warham Road site". (W11).	Supported for part of alternative site W11 noted.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Wells	W11	Mr Ashby (1216926)	AC066	Support	I would like to support Miss Cheryl Crawford's points, along with the planners in the unsuitability any kind of development on this site. It is an area of outstanding natural beauty and is home to many species of rare birds, as well as fauna. It would be a detriment to Wells as a whole of this site was developed, when there are more suitable sites available, developing this site would encourage urban sprawl. Due to parking congestion from the junction between Warham Rd and the Coast Rd would make it a more dangerous stretch of road to have access on.	Comments noted: The response supports the identification of W11 as a non preferred site
Wells	W11	Ms Crawford (1216649)	AC057/AC082	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY; This comment supports the view that this site is not a preferred option for the reasons given: It is remote from the town and its services, such that any development would significantly increase the use of cars requiring access to the town centre. It is external to the development area, within an Area of Outstanding Natural Beauty, and building on it would permanently negatively impact on flora, fauna and aesthetics Access to a highway is unsuitable/dangerous. Sufficient housing can be provided using other sites; even using a small strip of this site would open it up for further levels of development in the future which would be completely unsustainable and would also permanently impact flora, fauna and aesthetics	Comments noted: The response supports the identification of W11 as a non preferred site.
Wells	W11	Mr Curtis (1217497)	AC079	Support	In my view the proposed site W11 should not be considered due to the following issues. Any development on this elevated position will have a seriously detrimental effect on drainage and potential flooding to dwellings located north of the development. The out of town location will encourage the use of vehicles to and from the site thus increasing the already dangerous congestion that occurs during the summer months. Walking into town, especially for the elderly, will not be an option. The elevated position will create an urban skyline at the same time destroying the natural, local habitat Light pollution will be increased to the detriment of the rural aspect. I also question the need for speculative housing. It does not solve the needs of local people. The recent development to the west of the town has demonstrated that only a few of the properties have permanent residents.	Comments noted: The response supports the identification of W11 as a non preferred site

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Wells	W11	Mrs Moore (1217480)	AC077	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. Security - this very large development area would change the nature of Wells which is a low crime area. I would feel very less secure with such a large development so nearby. Noise pollution coupled with excessive speed already insupportable. Vastly increased traffic on such a narrow road combined with very limited access is sure to increase congestion. Loss of natural habitat for endangered wild life species and flora	Comments noted: Supports the assessment of the site as - not preferred.
Wells	W11	Dr Wilson (1217163)	AC064	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. W11 is indeed remote from the town and services, so residents on the site would use cars to access the main town. there is already insufficient parking provision for residents and tourists, so building on this site would add considerably to traffic problems and congestion. The site, in the countryside and on a slope, would impinge on the landscape affecting the AOB. The sloping nature of the site would lead to drainage and run off problems, possibly affecting the nearby chalk Ares. Water pressure is low in this part of town, and increasing it here would create problems in other parts of the town. Being in the countryside it is part of the important access to a network of bridle and footpaths allowing recreational and exercise and wildlife pursuits. It is productive farming land which is becoming increasingly important The site itself is home and also pathways for wildlife, including hedgehogs, tawny owls, barn owls, frogs, toads and diverse newts. The nearby light railway is a Nature Reserve and development on W11 would impact on this. So the site would not seem to be best placed to facilitate development.	Comments noted: Supports Assessment of the site.
Wells	W11	Mr Ashby (1216926)	AC066	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. The fact that this area is open countryside. support Miss Cheryl Crawford's points, along with the planners in the unsuitability any kind of development on this site. It is an area of outstanding natural beauty and is home to many species of rare birds, as well as fauna. It would be a detriment to Wells as a whole of this site was developed, when there are more suitable sites available, developing this site would encourage urban sprawl. Due to	Comments noted: Supports Assessment of the site.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					parking congestion from the junction between Warham Rd and the Coast Rd would make it a more dangerous stretch of road to have access on.	
Wells	W11	Ms Crawford (1216649)	AC057	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Supports Assessment of the site.- I support the proposal that W11 is not a preferred site and suggest it should not be considered at all for the following reasons: 1. The junction between Warham Road and the Coast Road is already congested and extremely difficult to cross during busy periods. Any increase in cars from Warham Road will exacerbate an already potentially dangerous situation, and increasingly discourage use of cycles or travelling by foot into town. This is particularly true when there is parking for local businesses and residents of California Row. 2. W11 is outside of the current residential and development area so the distance between the town centre and any development on Warham Road will encourage use of a car, further congesting an already very congested town with all the parking problems already encountered. 3. Development of this site would be a pronounced and obvious extension to the built environment, adversely affecting the landscape and AoNB. The LDP describes North Norfolk as characterised by rolling arable farmland which is exactly what W11 is. The LDP vision is to support this landscape character. The view from the sensitive Saltmarsh, a SSSI and National Nature Reserve, would be immeasurably spoiled particularly as the fields slope up from Warham Road, which would also influence the aesthetics as one enters the town from both the Coast Road and Warham Road. 4. The area is blessed with dark skies, something the LDP wants to promote, which would be impossible to rekindle once lost. 5. The town already suffers surface water flooding such that it drains down towards Warham Road from overflow both from Burnt Street and Market Lane. During heavy storms (which are becoming increasingly common) the flow of water running down the track within W11 can be torrential. The farmland is currently able to soak up much of the rainfall such that houses along Warham Road have never been flooded. However, during heavy storms any reduction in farmland in favour of development would place Warham Road residents at high risk of flooding. 5. The site has potential for far more homes than the town can sustain. The High</p>	Comments noted: Supports Assessment of the site. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>School is already full with a waiting list, the health care provision listed in the document suggested Clark PM Dental Care is available but this service closed. Such a site would support ever increasing numbers of second homes and holiday lets which are affecting shopping provision such that the wide range of retail outlets mentioned in the LDP is actually is on the decline, while gift and card shops together with cafes are increasing. This is amplified by the recent loss of the only bank in Wells. The LDP suggested the range of employment opportunities is broad for the potential new inhabitants but the majority of employment is within lower income brackets, while public transport systems have been revised and do not readily lend themselves to transport to work elsewhere. 6. Again linked with the numbers of houses which could be built: The town has experiences of investors, buying off plan and selling at an increased value later, thereby fuelling yet more increases in house prices, preventing local people from being able to buy. It is argued that some second homes are bought for retirement so that later in life they become permanent homes. However, the reality is that at the end of retirement the home is again available for purchase as a second home so that the percentage of permanent residents changes little. This is within a background of houses recently built in Holt still being empty. 6. The LDP vision is to make the most of field margins for biodiversity to provide a network of semi-natural features. Nearby is the Chalk Pit, an SSSI and the Wells - Walsingham Light Railway, a Country Wildlife site. Next to the field is the old railway cutting, a haven for wild life, much of which extends out into the field. The LDP recognises Flora and Fauna rely upon a network of available sites to survive so isolating this SSSI, the Wildlife site or the Railway Cutting by developing the field will be detrimental. One field does have extensive margins around it, while the other is grazed land. Both fields, during the year, support populations of lapwings, curlews now in decline, oyster catchers and bats. There is a resident barn owl which uses the field margins to hunt. Other birds of prey which are prevalent over the two fields are kites, buzzards, marsh harriers, sparrow hawks and kestrels. The fields also support cuckoos (increasingly rare), tree creepers and a variety of small birds, particularly within the tit family e.g.flocks of long tailed tits. There</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					are also a range of wild flowers, particularly within the field which is cut or grazed specifically to encourage a diverse flora. 7. Provision of utilities would be problematic: water pressure is already low within this area, while foul water is mentioned above as likely to create a flood risk. To date attempts to boost pressure in the area have created over pressurisation problems down in the town. 8. The track referred to as running between the two fields in W11 becomes a bridle way near the field which links with a range of lanes to Wighton and Warham. It also forms part of the National Cycle Route 1 linking Wells and Holkham with Fakenham and Kings Lynn. The LDP vision is to preserve and encourage walking and cycling and this network is well used by horse riders, walkers, dog owners and cyclists. Any development around it would spoil this amenity. 9. The Old Victorian Water Tower is also by the track. Would any development preserve this?	
Wells	W11	Ms Crawford (1216649)	AC082	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. - Objection to use of W11 for development because of potential impact on wildlife - specifically concerns for two of the ten bat species living in the area: Leisler's bat (scarce in GB) and Nathusius pipistrelle (rare in GB)	Comments noted: Supports Assessment of the site. Consider feedback in the finalisation of preferred sites.
Wells	W11	Mr Curtis (1217497)	AC079	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site. - In my view the proposed site W11 should not be considered due to the following issues. Any development on this elevated position will have a seriously detrimental effect on drainage and potential flooding to dwellings located north of the development. The out of town location will encourage the use of vehicles to and from the site thus increasing the already dangerous congestion that occurs during the summer months. Walking into town, especially for the elderly, will not be an option. The elevated position will create an urban skyline at the same time destroying the natural, local habitat Light pollution will be increased to the detriment of the rural aspect. I also question the need for speculative housing. It does not solve the needs of local people. The recent development to the west of the town has demonstrated that only a few of the properties have permanent	Comments noted: Supports Assessment of the site. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					residents.	
Wells	W11	Holkham Estate (Ms Lydia Voyias, Savills) (1215901 930627)	AC083	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported W11. In respect of sites at Wells reference has been made to a smaller site than previously submitted at Land South of Warham Road. We would like you to please reassess the development potential of this reduced site area.	Comments noted: Support for alternative site W11. Consider the assessment of alternative sites through the plan making process.
Wells	W11	Mr Fennell (1217420)	AC074	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment of the site W11. Homes for Wells supports the reasoning behind the recommendation not to prefer W11. It is a large site, very conspicuous in the landscape, very precious as a natural habitat for rare species; it is remote from the town centre and would generate significant additional road traffic. Homes for Wells hopes to identify and propose other sites for consideration as part of its submissions to the draft Neighbourhood Plan.	Comments noted: Supports Assessment of the site.
Wells	W11	Mr Rainsford (1216818)	AC081	General Comments	Wells Neighbourhood Plan, Local Plan Questionnaire: The survey results showed 42 (16%) of first preferences in favour of this site and 91 (38%) of second preferences.	Comments noted.
Wells	W11	Holkham Estate (Ms Lydia Voyias, Savills) (1215901 930627)	LP562	Object	It is requested that the Council reconsider the potential for a smaller parcel of land at 'Land south of Warham Road, Wells-next-the-Sea' for mixed use development comprising 50 dwellings and circa. 0.75 hectares of light industrial commercial workspace. The landowner is in the process of preparing a concept masterplan for this proposal. Mixed Use The National Planning Policy Framework (NPPF) seeks to create inclusive and mixed communities. The mix of uses proposed for the site complements the existing residential and employment uses in proximity to the site. Paragraph 104 of the NPPF identifies the benefits of an appropriate mix of uses to minimise the number and length of journeys. Site Assessment It is acknowledged that a much larger site was previously submitted for consideration as part of the Call for Sites which was given the reference W11.	Site promotion noted. This representation is a repetition of comments submitted against the Alternative site considered document.

	Number Received	Summary of Responses (Alternatives Sites in Wells-next-the-Sea)
Objection	1	The majority of comments regarding sites in Wells are in favour of the assessment of alternatives that are not proposed as preferred sites in the Local Plan. One comment was made to support site W11 requesting that the council consider a smaller parcel of land for mixed use development.
Support	21	
General Comments	0	

DRAFT

Blakeney

Alternative Sites in Blakeney

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
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Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Blakeney	BLA01	Mr & Mrs Albany (1210593 / 1216374)	AC047 / AC046	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: BLA01 and BLA09 would have less of a landscape and visual impact, no impact on the setting of St Nicholas Church, limited effects on residential amenity and potential benefits in terms .BLA01 and BLA09 would have less of a landscape and visual impact, no impact on the setting of St Nicholas Church, limited effects on residential amenity and potential benefits in terms . BLA01 should be promoted as the preferred housing allocation in Blakeney as it would have less landscape and visual impact, not adversely impact key views of St Nicholas Church and can be accessed off Langham Road, with options for a second access off Morston Road for pedestrians/cyclist and vehicles (if visibility splays can be provided). BLA09 should be promoted as the preferred housing allocation in Blakeney as it would have less landscape and visual impact, not adversely impact key views of St Nicholas Church and can be accessed off Langham Road.	Comments noted: Object to the allocation within the Local Plan and support the alternative sites BLA01 and BLA09.
Blakeney	BLA01	Mrs Albany (1216374)	AC049	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: I am supporting the case for BLA01 which has been grossly overlooked in favour of BLA04/A and thus I am requesting its re-evaluation. BLA01 should be reconsidered and become the Preferred Site as it negates many of the identified issues with BLA04/A by reducing a) the obvious negative impacts of the BLA04/A setting in the landscape, and b) builds on the success of the 2015 Avocet View	Comments noted: Object to the allocation within the Local Plan and support the alternative site BLA01.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					housing development (which is part of the original field that BLA01 and BLA09 remain part of), and brings an unparalleled strategic opportunity of addressing where future housing could be built outside the current Local plan period of 2016-36.	
Blakeney	BLA01	Mr Albany Mrs Kewell Mrs Roden (1216772 1216776 1216777)	AC055	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Alternative Site is supported - a) Visual impact : The Alternative Preferred Sites BLA01 and BLA09 are more enclosed from a landscape and visual perspective than BLA04/A. This is due to the more intact hedgerow along the western side of Langham Road, vegetation along the boundary with the Wiveton Downs SSSI, and the urban edge of the village. Siting of 30 houses to the North West/West edge of BLA01 would have minimal additional visual impact when viewed from the Morston, Langham and Saxlingham roads on entry into the village. b) Access Aspects : BLA01 appears to have been ruled out because of access concerns off Morston Road. Access from Langham Road (via BLA09 which is in the same available ownership as BLA01) is however recognised by NNDC in the Suitability Conclusions. Access from Langham Road along a new Avocet View boundary access road is entirely possible as only a strip of BLA09 would be required and this road would be sited where the mature hedge was removed when the Avocet View development was built; thus no additional mature boundary hedging would be remove and thus it will maintain the current degree of screening from the Langham Road. c) Future Housing Needs: Blakeney has been identified as a Growth Village€• in the Local Plan. This suggests that more housing maybe needed earlier in the Local Plan period. Where will such future development be sited? All other sites within the current Local Plan have been discounted for a variety of reasons. Only BLA01 was in-depth reviewed against BLA04. If BLA04 needed to be developed beyond BLA 4/A, i.e the whole 4.4 hectare field, then the visual and environmental impact would be excessive. Whereas the full development of BLA01 land area would minimise future visual impact from any access road into the village. The land BLA01 is only twice the area as currently needed for the proposed 30 houses. Making BLA01 as the Preferred Site would therefore offer a clear direction as to where more housing can be sited. It could be</p>	Comment noted: Object to the proposed site within the Local Plan, support for alternative sites BLA01/ BLA09. Collectively the sites represent higher housing numbers that required. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					so identified in the emerging Neighbourhood Plan. There would also be an existing access road from which a similar development to that envisaged could be built off from. d) Social and Safety Aspects : Development of 30 houses on BAL01 would allow the new development to be well integrated into the landscape, and also have a direct connection with the Queen's Close housing area, and thus the centre of the village. There certainly could be pedestrian access via Haywards Close, although vehicular access may cause traffic issues. Pedestrian access via Harbour Way should also be possible. Access to the daycare facilities at Thistleton Court (in Queen's Close) would be a real benefit to new residents who may need such services. Children attending the village school could walk out of Queen's Close and via the main playing fields to safely walk along New Road to the school by the church. Residents walking to the local Spar shop and Doctors surgery would not need to walk down the busy Langham Road but could go via Queen's Close.	
Page 813 Bakeney	BLA01	Mr Roden Mr Albany (1210592 1210593)	AC047	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported. Alternative site allocation BLA01 is more enclosed from a landscape and visual perspective than BLA04/A. This is due to the more intact hedgerow along the western side of Langham Road, existing settlement on Morston Road, vegetation along the boundary with the Wiveton Downs SSSI and the urban edge of the main village. BLA01 appears to have been ruled out because of access concerns off Morston Road. However, the site could also be accessed off Langham Road through BLA09, which is in the same ownership. This is recognised in the fourth column of Appendix B of Background Paper 6: Development Site Selection Methodology (Summary of Site Assessment for Selected Settlements), but is ignored in the fifth column (Suitability Conclusions). It is clear from the Councils' own assessment that a suitable access off Langham Road could be provided. As such, access should not have been used to rule BLA01 out as the preferred site. The Suitability Conclusion in Background Paper 6, referenced above, states that: The site is sheltered from view on the Morston Road edge of the settlement, however, depending on scale and form, could have a negative visual impact on the landscape when viewed from the Langham Road approach. However, it is clear from site	Comments noted: Support for alternative site BLA01. Consider the assessment of alternative sites through the plan making process.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					visits that there would be limited visibility of BLA01 from Langham Road due the intact hedgerow and the land falling away to the north. This established hedgerow could easily be grown higher and be supplemented with additional woodland planting to avoid any visibility from Langham Road. As such BLA01 would have far less landscape and visual impact than BLA04/A and sequentially should be preferred to BLA04/A.e existing settlement.	
Blakeney	BLA01	Mrs Albany (1216374)	AC049	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Alternative Site is supported. Reasons to support the change:- a) Visual Impact The Alternative Preferred Sites BLA01 and BLA09 are more enclosed from a landscape and visual perspective than BLA04/A, due to the more intact hedgerow along the western side of Langham Road, vegetation along the boundary with the Wiveton Downs SSSI, and the urban edge of the village. Siting of 30 houses to the North West/West edge of BLA01 would have minimal additional visual impact when viewed from the Morston (A159), Langham (B1156) and Saxlingham roads on entry into the village. b) Access Aspects BLA01 appears to have been ruled out because of access concerns off Morston Road. Access from Langham Road (via BLA09 which is in the same available ownership as BLA01) is however recognised by NNDC in the Suitability Conclusions. Access from Langham Road along a new Avocet View boundary access road is entirely possible as only a strip of BLA09 would be required and this road would be sited where the mature hedge was removed when the Avocet View development was built; thus no additional mature boundary hedging would be removed and thus it will maintain the current degree of screening from the Langham Road (B1156). The Ownership of BLA01 have indicated that it is readily available for disposal for housing projects. c) Future Housing Needs Blakeney has been identified as a Growth Village in the Local Plan and now requires to 30 dwellings. This suggests that more housing maybe needed earlier in the Local Plan period. Where will such future development be sited? The Ownership of BLA01 and BLA09 have indicated that this land is readily available for disposal for housing projects. The whole of BLA01 could possibly house 60 dwellings. All other sites within the current Local Plan have been discounted for a variety of reasons. Only BLA01 was in-depth reviewed against</p>	Comments noted: Support for alternative sites BLA01 and BLA09. Consider the assessment of alternative sites through the plan making process.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>BLA04. If BLA04 needed to be developed beyond BLA 4/A, i.e the whole 4.4 hectare field, then the visual and environmental impact would be excessive and environmentally overbearing Whereas the development of BLA01 and 09 land area would minimise future visual impact from any access road into the village. The land area of BLA01 is only twice the area as currently needed for the proposed 30 houses. Making BLA01 as the Preferred Site would therefore offer a clear direction as to where more housing can be sited. A further 20-30 houses could be easily accommodated. It could be thus identified in the emerging Blakeney Neighbourhood Plan. There would then already be an existing access road from which a similar development to that envisaged above could be built off from. d) Social and Safety Aspects Development of 30 houses on BLA01 would allow the new development to be well integrated into the landscape. As importantly it will also have a direct connection with the Queen's Close housing area, and thus through this to the centre of the village. There can be pedestrian access from BLA01 directly into Haywards Close, although vehicular access may cause traffic issues. Pedestrian access via Harbour Way should also be possible. Access to the day-care facilities at Thistleton Court (in Queen's Close) would be a real benefit to new residents who may need such services. Children attending the village school could walk out via Queen's Close and then walk in safety via the main playing fields and along New Road to the school by the church. Residents walking to the local Spar shop and Doctor's surgery would not need to walk down the busy Langham Road but also could go via Queen's Close A sketch plan of how BLA01 can be accessed and developed is attached.</p>	
Blakeney	BLA01	The Oddfellows (Strutt & Parker) (1219331 & 1219332)	LP826	Object	The Oddfellows support the alternative sites BLA01 (Land south of Morston Road) and BLA09 (Land west of Langham Road), which form a continuous land parcel, being available, deliverable and achievable.	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Blakeney	BLA04/A	Mr & Mrs Albany (1210593 / 1216374)	AC046/AC049	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Objection to allocation of BLA04/A as the preferred housing location in Blakeney Given the potential long term impact of development within a relatively small village a more strategic long term approach should be adopted, rather than the piecemeal approach currently proposed. BLA01 and BLA09 would have less of a landscape and visual impact, no impact on the setting of St Nicholas Church, limited effects on residential amenity and potential benefits in terms. BLA01 should be reconsidered and become the Preferred Site as it negates many of the identified issues with BLA04/A by reducing a) the obvious negative impacts of the BLA04/A setting in the landscape, and b) builds on the success of the 2015 Avocet View housing development (which is part of the original field that BLA01 and BLA09 remain part of), and brings an unparalleled strategic opportunity of addressing where future housing could be built outside the current Local plan period of 2016-36.</p>	Comments noted: Object to the allocation within the Local Plan and support the alterantive sites BLA01 and BLA09.
Blakeney	BLA04/A	Mr Roden Mr Albany (1210592 1210593)	AC046	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Objecting to the Assessment. Allocation BLA04/A is not reasonably well enclosed in the landscape but very prominent. Views across the arable field from Langham Road to the east are very open due to the intermittent fragmented hedge on the east side of the road. In contrast, views to the west are less open due to a continuous hedgerow that provides a degrees of screening of recent development at Avocet View and further development opportunities to the west of Langham Road. The existing settlement edge is defined by a line of pines and other trees to the south of properties on Kingsway and deciduous woodland further to the east. These have taken c. 50 years to mature and provide the current screening benefits. These trees filter views of the properties on Kingsway, softening the urban edge of Blakeney. Development of land within BLA04/A would be highly conspicuous, introducing a hard edge to the settlement that would take a number of decades to soften with appropriate planting. This would have adverse landscape and visual effects from one of the main roads accessing Blakeney and footpaths to the south. Whilst the line of pines and other trees soften the urban edge of Blakeney, when viewed from the south, they would not screen views of development in BLA04/A from</p>	Comments noted: Support for alternative sites BLA01 and BLA09. Consider the assessment of alternative sites through the plan making process.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response	
Page 817					properties on Kingsway. South facing views from the eight residential properties bordering the site are available under the tree canopies across the arable field. This would be contrary to ENV 10 of the First Draft Local Plan. Development of allocation BLA04/A would have adverse effects on the setting of St Nicholas Church. The Blakeney Draft Conservation Area Appraisal & Management Plan sets out the need to appreciate heritage assets individually or collectively from key viewpoints that contribute to their special interest. BLA04/A as the preferred location appears to be based on factual errors and contradictory assessments that are not robust when reviewed through site visits. The selection of the preferred site allocation should be reconsidered in favour of sites that are less conspicuous in the landscape, would have less of an impact on residential amenity, public footpaths and the setting of St Nicholas church. (See accompanying document). Blakeney has been identified as a Growth Village and it is considered that a longer term strategy to integrating development should be taken beyond the current plan period. The existing Avocet Way development was included in the previous Local Plan, but no consideration was given to the future need for expansion or integrating the site with the wider community of Blakeney. The current plan review is an opportunity to take a long term strategic approach to development within the village and to integrate future proposals more fully with the existing settlement. Development within BLA01 & BLA09 would be a natural extension to the recent Avocet View development.		
	Blakeney	BLA09	The Oddfellows (Strutt & Parker) (1219331 & 1219332)	LP826	Object	The Oddfellows support the alternative sites BLA01 (Land south of Morston Road) and BLA09 (Land west of Langham Road), which form a continuous land parcel, being available, deliverable and achievable.	
	Blakeney	BLA09	Mr Albany (1210593)	AC048	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY :BLA01 and BLA09 would have less of a landscape and visual impact, no impact on the setting of St Nicholas Church, limited effects on residential amenity and potential benefits in terms .BLA09 should be promoted as the preferred housing allocation in Blakeney as it would have less landscape and visual impact, not adversely impact	Comments noted: Object to the allocation within the Local Plan and support the alternative sites BLA01 and BLA09.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					key views of St Nicholas Church and can be accessed off Langham Road.	
Blakeney	BLA09	Mr Albany Mrs Kewell Mrs Roden (1216772 1216776 1216777)	AC055	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Alternative Site is supported - a) Visual impact : The Alternative Preferred Sites BLA01 and BLA09 are more enclosed from a landscape and visual perspective than BLA04/A. This is due to the more intact hedgerow along the western side of Langham Road, vegetation along the boundary with the Wiveton Downs SSSI, and the urban edge of the village. Siting of 30 houses to the North West/West edge of BLA01 would have minimal additional visual impact when viewed from the Morston, Langham and Saxlingham roads on entry into the village. b) Access Aspects : BLA01 appears to have been ruled out because of access concerns off Morston Road. Access from Langham Road (via BLA09 which is in the same available ownership as BLA01) is however recognised by NNDC in the Suitability Conclusions. Access from Langham Road along a new Avocet View boundary access road is entirely possible as only a strip of BLA09 would be required and this road would be sited where the mature hedge was removed when the Avocet View development was built; thus no additional mature boundary hedging would be remove and thus it will maintain the current degree of screening from the Langham Road. c) Future Housing Needs: Blakeney has been identified as a Growth Village in the Local Plan. This suggests that more housing maybe needed earlier in the Local Plan period. Where will such future development be sited? All other sites within the current Local Plan have been discounted for a variety of reasons. Only BLA01 was in-depth reviewed against BLA04. If BLA04 needed to be developed beyond BLA 4/A, i.e the whole 4.4 hectare field, then the visual and environmental impact would be excessive. Whereas the full development of BLA01 land area would minimise future visual impact from any access road into the village. The land BLA01 is only twice the area as currently needed for the proposed 30 houses. Making BLA01 as the Preferred Site would therefore offer a clear direction as to where more housing can be sited. It could be</p>	Comment noted: Object to the proposed site within the Local Plan, support for alternative sites BLA01/ BLA09. Collectively the sites represent higher housing numbers that required. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					so identified in the emerging Neighbourhood Plan. There would also be an existing access road from which a similar development to that envisaged could be built off from. d) Social and Safety Aspects : Development of 30 houses on BAL01 would allow the new development to be well integrated into the landscape, and also have a direct connection with the Queen's Close housing area, and thus the centre of the village. There certainly could be pedestrian access via Haywards Close, although vehicular access may cause traffic issues. Pedestrian access via Harbour Way should also be possible. Access to the daycare facilities at Thistleton Court (in Queen's Close) would be a real benefit to new residents who may need such services. Children attending the village school could walk out of Queen's Close and via the main playing fields to safely walk along New Road to the school by the church. Residents walking to the local Spar shop and Doctors surgery would not need to walk down the busy Langham Road but could go via Queen's Close.	
Bokeney	BLA09	Mr Roden Mr Albany (1210592 1210593)	AC048	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported. Alternative to options (BLA04/A) should be considered in more detail. The Suitability Conclusion in Background Paper 6 states that BLA09: could have a negative visual impact on the landscape when viewed from the Langham Road approach. However, based on site visits it is clear that alternative site allocation BLA09 is more enclosed from a landscape and visual perspective than the currently preferred site (BLA04/A). This is due to the more intact hedgerow along the western side of Langham Road, existing settlement on Morston Road, vegetation along the boundary with the Wiveton Downs SSSI and the urban edge of the main village. There would be limited visibility of BLA09 from Langham Road due the intact hedgerow and the land falling away to the north. This established hedgerow could easily be grown higher and be supplemented with additional woodland planting to limit visibility from Langham Road. As such BLA09 would have far less landscape and visual impact than BLA04/A and sequentially should be allocated in preference to BLA04/A. BLA09 can be accessed off Langham Road and this has been identified as acceptable in NNDC appraisals. As such, there is no difference between BLA04/A and	Comments noted: Support for alternative site BLA09. Consider the assessment of alternative sites through the plan making process.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					BLA09 in respect of access considerations.	

	Number Received	Summary of Responses (Alternatives Sites in Blakeney)
Objection	4	A number of comments raise objections to the preferred site being within the Local Plan. The primary issues raised are in regard to landscape, the historic environment and residential amenity. A number of comments offer support for the alternative sites, BLA01 and BLA09, as it is proposed that these sites would have less significant impacts upon the landscape, the historic environment and residential amenity. The highway objections to these sites are disputed and it is stated that the alternative sites are available, deliverable and achievable.
Support	10	
General Comments	0	

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Briston

Alternative Sites in Briston

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Briston	BRI10	Mr Danials Mr Jenkins (1217050 1217047)	AC061 AC075	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Alternative Site is supported - There are concerns that the Council has failed to fully assess the alternative sites put forward in Briston and have not fully explained their reasoning as to why sites have been rejected in preference to the two sites which are proposed for allocation. Both these sites have clear constraints and issues associated with their development. There are also concerns that the selection of these sites has prejudiced the consideration of other sites. Seek for a full and detailed assessment of all the sites to be undertaken so that it can be fully understood as how the alleged attributes of the proposed allocations outweigh those of the rejected advice, sites particularly in relation to the criteria detailed at paragraph 21.5 of the consultation draft local plan. See attached Transport Statement which details how the highway impacts of this scheme can be ameliorated and how the scheme could result in highway safety improvements in the vicinity of the site. It also demonstrates that the District Council's comments regarding access are incorrect. The attached document also needs to be read in conjunction with the earlier representations submitted on behalf of Mr Daniels in relation to this site.	Support for alternative site BRI10 - Comments noted. Background Paper 6 Site Selection Methodology published as part of this consultation provides full detail on the methodology used and the results of each site assessment including alternative sites. Consider feedback in the submitted transport assessment in the finalisation of preferred sites
Briston	BRI10	Mr Jennings Mr Daniels (1217047 1217050)	AC061	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objection to Assessment of all Alternative sites BRI10. There are concerns that the Council has failed to fully assess the alternative sites put forward in Briston and have not fully explained their reasoning as to why sites have been rejected in preference to the two sites which are proposed for	Comments noted: Objection to Assessment of all Alternative sites. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					allocation. Both these sites have clear constraints and issues associated with their development. There are also concerns that the selection of these sites has prejudiced the consideration of other sites.	
Briston	BRI10	Mr Jennings Mr Daniels (1217047 1217050)	AC061	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objection to Assessment of all Alternative sites BRI10 - There are concerns that the Council has failed to fully assess the alternative sites put forward in Briston and have not fully explained their reasoning as to why sites have been rejected in preference to the two sites which are proposed for allocation. Both these sites have clear constraints and issues associated with their development. There are also concerns that the selection of these sites has prejudiced the consideration of other sites.	Comments noted: Support for alternative site.
Briston	BRI10	Mr Jennings Mr Daniels (1217047 1217050)	AC075	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objection to Assessment of all Alternative sites BRI10 - Attached statement provides details as to how the highway impacts of the scheme can be addressed. See attached Transport Statement which details how the highway impacts of this scheme can be ameliorated and how the scheme could result in highway safety improvements in the vicinity of the site. It also demonstrates that the District Council's comments regarding access are incorrect. The attached document also needs to be read in conjunction with the earlier representations submitted on behalf of Mr Daniels in relation to this site.	Comments noted: Support for alternative site. Consider feedback in the finalisation of preferred sites.
Briston	BRI11	Mrs Williams (1216484)	AC050	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Objecting to the Assessment. Our land is available for immediate development and can be vacant within a 6 month notice period. We would like it to come forward for development. note: the Council feel there are highway constraints but we believe these can be overcome with further investigation and work. Our land backs onto existing housing which is situated on the main in the centre of the village and would consolidate housing in the central core of the village. Key services such as water and electricity are already in place at the site.	Comments noted: Support for alternative site. Consider the assessment of alternative sites through the plan making process.

	Number Received	Summary of Responses (Alternatives Sites in Briston)
Objection	0	A number of comments raise objections to the preferred site being within the Local Plan. The primary issues raised are in regard to the constrains and issues on the sites. It is proposed that the assessment of sites BRI10 and BRI11 has not been undertaken sufficiently and that these sites should be considered preferred sites in the Local Plan.
Support	5	
General Comments	0	

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Ludham

Alternative Sites in Ludham

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Ludham	LUD05	Mrs Crichton (Lanpro Services) Mr Monk (1208138 1217392)	AC072	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Alternative Site is supported - Site LUD05 was considered through the HELAA (Ref H0137/LUD05) in June 2017 and the only matters which were marked as red were related to highways. In the First Draft Local Plan (Part 1) Alternatives Considered document the site has been identified as not a preferred site due to unsatisfactory access and a negative effect on the landscape but extending development into the open countryside. Highways - In order to address the highway related concern, the landowner instructed us to undertake discussions with Norfolk County Council Highways to look to resolve this matter which has now been done. To accompany this submission an indicative layout and access strategy have been prepared and sent to Highways who confirmed, based on these details there would be no highway objection. This has been confirmed in an email from Andrew Willeard dated the 4th December 2018 (enclosed with this submission). Therefore, it is considered that the Council can not maintain an objection to this site based on highway grounds. Landscape Impact - The accompanying indicative masterplan demonstrates how 20 dwellings and a new doctor's surgery and areas of open space and new planting. The site is not located in a more sensitive landscape than either of the proposed allocations. It is stated that the site will extend into the open countryside, but the site will not extend any further east of Ludham than proposed allocation LUD06/A. The density of the scheme is such that it respects the sites position on the edge of the countryside with extensive</p>	Comments noted: Support for alternative site LUD05. Additional information has been submitted. Consider feedback in the finalisation of preferred sites.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>areas of landscaping that could be accommodated (as demonstrated in the indicative masterplan). This will provide a soft edge to the development as you leave and enter the village from an easterly direction. The site is not currently agricultural land (it is used for horse grazing) therefore there is no loss of best and most versatile land agricultural land. Landscaping proposals would form part of any planning application process and it is not considered that a scheme could not be designed which couldn't mitigate any impacts in the same way that they would have to be done with any of the other proposed allocated sites. The area shown for a doctor's surgery is proposed by the landowner as he has been in discussions with the Parish Council and understands there is a growing need for a new site for an enlarged surgery to cater for the growth. Discussions are on-going and further information can be provided on this in due course.</p>	
Ludham	LUD09	Deloitte Real Estate Tucker, Mr Nolan (1217045)	LP252	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: These representations put forward land south of Norwich Road, Ludham as a suitable for allocation for residential development; assisting in the required growth or North Norfolk over the Plan period. The previous representations were supported by a number of supporting documents including a concept Masterplan Site Access Feasibility Review and access appraisal. The constraints identified through the SHLAA assessment can be overcome; no designated heritage assets on or immediately adjoining the Site, nearest assets to the east of site. Gently sloping, not PDL and no contamination. Site is in single ownership. Majority of site is in Flood Zone 1. The part of the site to the south and east, which is not proposed for development, is in Flood 2 and 3 and has been identified as having the potential to form part of the public open space for the Site. Access appraisal shows how access can be achieved on western end on Norwich Rd with appropriate visibility splays. the Site also has clear advantages in terms of its location, being in close proximity to local services. Would help to boost housing numbers in North Norfolk and would provide more certainty that the housing delivery targets within the North Norfolk Local Plan can be met over the Plan period. The site is deliverable, viable, and suitable. Contribute to the housing needs of North Norfolk; Providing a varied choice of housing, designed to improve local character and built to ensure a high standard of sustainable construction to meet the needs of future generations; Providing a number of economic benefits including</p>	<p>Background paper no6 published with this consultation provides full detail on the methodology used and the results of each site assessment. The reason the site is not preferred is the Highway Authority do not support an additional access onto the A1062 and there is no continuous footway link to the village with no ability to provide a new footpath at sections along the road. This site provides an important open landscape in this part of Ludham. Development of this site would have a greater impact on the quality of the landscape than the preferred sites. Furthermore the preferred sites can deliver sufficient housing for Ludham. Further consideration of the Access Appraisal required.</p>

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					job creation (direct and indirect) and increasing the expenditure in the local economy by supporting the continued vitality and vibrancy of existing nearby services and facilities;Improvement of vehicle, pedestrian and cycle connections;Provision of high quality open space, including the retention of existing hedgerows and ponds as part of a site-wide SUDS network; and Contributing to enhancing the landscape character through the provision of high quality green infrastructure.	

	Number Received	Summary of Responses (Alternatives Sites in Ludham)
Objection	2	Limited support is given to two sites in Ludham as being more suitable than the preferred site. The sites are both considered to be available, deliverable and achievable.
Support	0	
General Comments	0	

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Mundesley

Alternative Sites in Mundesley

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Mundesley	N/A	N/A	N/A	N/A	No comments received.	N/A

	Number Received	Summary of Responses (Alternatives Sites in Mundesley)
Objection	0	No comments received.
Support	0	
General Comments	0	

Other Areas

Alternative Sites in High Kelling

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

This table includes a fourth scenario where a respondent promoted an alternative site which does not feature in the First Draft Local Plan or Alternatives Considered consultation documents.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
High Kelling	HKG04/A	White Lodge (Norwich) Ltd Lawson Planning Partnership Oelman, Ms Kathryn (1217091 1217088)	LP291 LP293	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: White Lodge (Norwich) Limited are the sole owner of 'the Former Nursery site' identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical nor desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating	Comments noted: Alternative site suggestions put forward will be considered in future iterations of the emerging Plan. This site has been promoted through the Call for Sites exercise.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue. Request that land identified at the Former Four Seasons Nursery is allocated as a small site for up to 20 units within the Local Plan. The site is available for development now, and prior to adoption of the plan, and its suitability and deliverability have been recognised in HELAA. Transport statement provided in May 2016, demonstrated that traffic generated by development of the site for housing purposes would result in an overall decrease in vehicle movements, both accesses appropriate and are capable of being provided. Indicative layout provided, site capable of providing 16 dwellings. Final numbers will be influenced by the chosen mix, scale and layout of development proposed at a later stage and could increase or decrease in response to these detailed considerations. Retain area of land immediately east of Woodland Lodge to ensure separation likely to become garden area. Sufficient separation between dwellings can be achieved. No heritage assets in vicinity. Trees subject to TPO and substantial area of woodland designated as County Wildlife Site on opposite side of Selbrigg Rd. Trees on northern and southern boundaries would be retained and trees planted. Site within Flood Risk 1, surface water could be directed away from proposed dwellings. The Former Nursery site proposes development of previously occupied land, which is located between existing residential dwellings, and is not subject to significant environmental constraints. This site should therefore be considered for allocation to provide much needed housing within the Small Growth Village of High Kelling. An additional site (HKG01/1) was proposed in Call for Sites 2016. Due to its location within the AONB boundary, site reference H0088 (and any others north of the Cromer Road) would not be preferable for allocation in comparison to other</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					identified suitable, available and deliverable sites which lie outside the AONB boundary, such as the Former Nursery site as proposed.	

	Number Received	Summary of Responses (Alternatives Sites in High Kelling)
Objection	0	A comment has been raised in support of site HKG04/A. It is set out that the site is available, deliverable and achievable and that the site would be more suitable than the preferred site.
Support	0	
General Comments	1	

Alternative Sites in Scottow

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

This table includes a fourth scenario where a respondent promoted an alternative site which does not feature in the First Draft Local Plan or Alternatives Considered consultation documents.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Scottow (Badersfield)	SCT01/A and SCT02	Glavenhill Ltd Lanpro Smith, Hannah (1218811)	LP736	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>These representations are submitted on behalf of the land promotor, Glavenhill Limited who is submitting the site (land adjacent to the former RAF Coltishall and the village of Badersfield) for its mixed-use, residential-led allocation on behalf of the landowner, Mr Simon Shaw. A Call for Sites (Small Growth Village) has been submitted along with a Sustainable Urban Extension Vision and Delivery Document. Whilst the North Norfolk site is modest in size, it forms part of a wider proposed allocation area which 'straddles' the two Districts of Broadland and North Norfolk and as set out below and within the enclosed, has the propensity to address a number of cross boundary development requirements in direct accordance with National Planning Policy Guidance. The site (as it relates to Broadland District) has been submitted and promoted through the Greater Norwich Local Plan consultation process. The provision of new homes on land adjacent to the Enterprise Park, together with much needed supporting social, community and highway infrastructure could ensure the continued success of this employment location and deliver a new self-sustaining and contained community for the two constituent Districts. The proposed allocation site, in seeking to address local needs across administrative boundaries, will facilitate on-going joint working between strategic policy-making authorities to produce a positively prepared and justified strategy in direct accordance with Paragraphs 25</p>	Comments noted: Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>and 26 of the NPPF. The land is under single ownership and is available and deliverable in the short to medium term. The subject site has been assessed by Glavenhill for its environmental sensitivity and the potential social and economic constraints and opportunities to development. The site is demonstrated within the enclosed Vision and Delivery Document to be 'suitable' for the proposed development and associated new public open spaces and strategic landscaping. In summary the vision document sets out that the extension can –provide a meaningful number of homes across the two authorities to assist in meeting individual and cross boundary housing needs (including affordable and or self-build units) – deliver a new care and extra care facilities to meet identified and pressing cross boundary needs for a mix of elderly person accommodation. –additional residents will provide an additional local working population and support the sustainable and longer-term performance of the Enterprise Park that at present relies heavily on inward commuters. – Provide land for a new primary school to overcome current capacity deficiencies within the local area (cross boundary) and assist in the upgrade or relocation of the current, specialist education facility in the area (subject to further discussions with the education provider) together with a new creche for use by employees of the adjacent Enterprise Park. -Deliver a range of supportive, small-scale commercial and community spaces to include potential small-scale retail provision for use by the existing and future communities. - Provide substantial areas of new green infrastructure, including recreation space and habitat areas to the benefit of the existing and future residential communities and North Norfolk's and Broadland's biodiversity networks. - Improve upon current difficulties with large HGVs travelling through the local villages to enter the Enterprise Park by providing a new dedicated site access to the Park, within the promoter's control. - Enhance the site's accessibility by sustainable transport modes through assisting in the delivery of a new dedicated shuttle bus service between the site and Worstead Train Station. Whilst the North Norfolk proposed allocation area forms part of a far wider proposed allocation site that has far wider reaching combined benefits in terms of addressing cross boundary needs, it can and should, for the purpose of this consultation, be considered to present a self-sustaining, suitable, available and beneficial development</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>offer in its own right. The site is located adjacent to the village of Badersfield which is identified as suitable and capable of accommodating small scale (in the order of 20 dwellings) new residential development, based upon its current local service provision. The settlement is recognised at page 92 of the Council's Background Pater 2, Distribution of Growth that has been published alongside the draft Local Plan to provide a "valuable functional role within the District". The Council conclude that "for Badersfield it is considered that the constraints would not limit the principle of development within the settlement". The provision of housing would in the Council's view help address housing need, enhance the vitality of the community and support the retention and viability of local services. The proposed North Norfolk allocation site is well related to the existing village and is bound on two sides by built form and to the west by woodland and the north by a major road link that clearly and defensibly delineates the proposed allocation site. The North Norfolk site can be seen from the enclosed documentation to be a well contained, defensible and sustainable small-scale extension to the existing settlement that is capable of being supported by the Council's existing Spatial Strategy when considered individually and / or as part of the wider (Broadland) proposed allocation area.</p> <p>Draft Policy SD3</p> <p>Whilst it is considered both logical and sustainable to focus growth within the larger settlements that are capable at present of sustaining additional population, the ability to improve upon the sustainability of a settlement by delivering a mix of uses, including a meaningful element of housing and assisting to address settlement specific needs, including affordable housing, is not, in Glavenhill's view, given appropriate recognition within Draft Policy SD3. Quotes paragraph 78. In this respect, the prescription of no more than 20 dwellings to all identified smaller villages within the Draft Plan is considered overly restrictive. As worded, the Policy lacks the necessary flexibility to allow development proposals to respond positively to the specific characteristics and needs of different settlements. Whilst Badersfield is considered by the Council to lack the necessary services to be 'designated' a larger village within the Settlement Hierarchy, it is capable and in need, due to the presence of a successful Enterprize Park that lacks a large residential / working</p>	

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>population nearby, and the need to provide additional new affordable homes, of accommodating additional residential and local service provision beyond that facilitated through draft Policy SD3. Contrary to paragraph 35 of the NPPF, the Draft Plan's restriction on growth within the smaller villages is considered to be neither 'justified', 'positively prepared' nor 'effective' in responding to the needs of individual populations. For the reasons set out above, and in order to make the Draft Plan 'sound', Glavenhill request that the rather arbitrary and unjustified restriction of between 0 – 20 dwellings for small villages be deleted from the policy and that this restriction be replaced by a criteria based approach to assessing settlement suitability and requirements to accommodate additional growth. That said, the enclosed Vision and Delivery Document demonstrates that the allocation of 40 dwellings at the proposed allocation site would not materially conflict with the Council's proposed Settlement Hierarchy as drafted and in this respect is capable of attracting the support of officers.</p>	

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	Number Received	Summary of Responses (Alternatives Sites in Scottow)
Objection	0	A comment has been made promoting a site for between 0-20 dwellings in Badersfield.
Support	0	
General Comments	1	

Alternative Sites in Sculthorpe

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Site Options', e.g. the proposed sites favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred site option** in the Alternatives Considered document
- an **alternative site option** in the Alternatives Considered document
- an **alternative site option** in the First Draft Local Plan

This table includes a fourth scenario where a respondent promoted an alternative site which does not feature in the First Draft Local Plan or Alternatives Considered consultation documents.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Sculthorpe	SCU01	WSP Indigo Taylor, Miss Emily (1217127)	LP632 LP633	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There is land available in Sculthorpe that could contribute towards meeting the pressing housing needs. Previously undeveloped, entirely within Flood Zone 1, with very limited areas of surface water flooding. There are no other environmental or landscape designations affecting the site. Adjacent to the Sculthorpe Village Conservation Area and there are two listed buildings located in the built development that lines Moor Lane and Creak Road. The site is well-screened, and large enough to for a layout to avoid having unacceptable impacts on heritage assets. Assessed through HELAA, H0216 or SCU01, shown in Figure 2. Assessment is included in Appendix 1 to these representations. Overall, the Council assesses the site as a 'less constrained development site' as opposed to a 'constrained site not suitable for development'. Despite this being the more favourable score for sites assessed as part of the HELAA, H0216 was not assessed in the Local Plan as a result of its place in the settlement hierarchy. Site H0216 risks being entirely overlooked by the Council as Sculthorpe is classed as a Small Growth Village where only small sites will be assessed for allocation, despite its positive assessment in the HELAA. This removes the chance to consider the best sites for development that are in sustainable locations but disregarded by the Council's current methodology. The site therefore generally scores highly against the various tests included in the assessment, however there are a number of indicators against which the site has been given a score of 'Amber' when	Comments noted: Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					<p>'Green' would be more appropriate. See WSP Indigo attachment for assessment which states that development of the site would not have any harmful effect upon the heritage significance of the Conservation Area. In relation to potential impact upon the setting and significance of other designated heritage assets, it would be possible through a sensitive masterplan and landscape planning-led approach to ensure that any contribution made to their significance by the open, rural character of the site is preserved, and potentially enhanced. The development of the site could be planned so that it would have no negative impact upon the historic townscape of the Conservation Area. The HEELA assesses the site as being large enough to accommodate up to 472 dwellings. This highlights the opportunity for a large scale, coherent scheme to come forward on the site. A sensitive master-planning process would identify the most appropriate sub-areas that could be developed. The site is clearly suitable for residential development, as demonstrated by the lack of constraints affecting its developable area and its excellent location in relation to the existing built form of Sculthorpe. It can also provide necessary infrastructure enhancements to support growth in the settlement. The Distribution of Growth Background Paper identifies that the school is lacking capacity but the site is large enough to accommodate a new school as part of development proposals. The existing Sculthorpe Primary School is a popular and successful school and its offer could be further enhanced by the provision of new premises and a playing field. Early Delivery As well as its suitability and availability, as established in the Council's own evidence base, the site is also deliverable in the short term. The site is under single ownership and the owner is committed to progressing proposals for the site if it were allocated, so it could deliver housing within the first five years of the Local Plan period. There are no constraints that would pose a risk to the delivery of housing on the site and copious amounts of evidence-based work has already been undertaken to provide a strong basis for a fast-tracked delivery of housing. The site is a key opportunity to allocate land for housing that can be brought forward in the short term.</p>	

	Number Received	Summary of Responses (Alternatives Sites in Sculthorpe)
Objection	1	A comment has been made promoting the site for small scale development. The assessment of the site in the HELAA has been disputed and it is affirmed that the site is available, deliverable and achievable.
Support	0	
General Comments	0	

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Alternative Sites in Sutton

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative site options which the Council has considered in preparing the First Draft Local Plan.

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This table includes a fourth scenario where a respondent promoted an alternative site which does not feature in the First Draft Local Plan or Alternatives Considered consultation documents.

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
Sutton	SUT02	Firs Farm Partnership Lanpro Rejzek, Ms Becky (1218497 1218496)	LP805	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: SUT02 can: • Provide up to 31 new homes to assist in meeting North Norfolk Council's identified housing needs (including affordable and/or self-build units); • Deliver improvements to existing surface water flooding problems in the village (see attached Supplementary Drainage Information Report for details); • Help to deliver improvements in water quality within the Ants Broads and Marshes SSSI (See attached Supplementary Drainage Information Report for details); • Provide land sufficient to accommodate a multi-use games area (MUGA) and children's play area in order to help provide improved recreational facilities for the village. The proposed allocation site is located towards the southern end of the village of Sutton which is identified within the First Draft Local Plan Part 1 as suitable and capable of accommodating small scale (in the order of 20 dwellings) new residential development, based upon its current local service provision. The previously submitted site plan demonstrates how up to 31 dwellings can be accommodated on the proposed allocation site. Whilst slightly in excess of the number suggested appropriate for small scale growth villages within the Draft Local Plan Part 1, it will deliver a sufficient number of homes to facilitate the provision of land to accommodate a new IDB pumping station which will provide surface water drainage improvements for the village and water quality improvements within the Ants Broads and Marshes SSSI as explained within the Supplementary Drainage Report. It is the only	Comments noted: Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

Settlement	Site Ref	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Sites)	Council's Response
					potential housing site within the village that can offer these benefits. In addition, it will enable an area of land within the site to be transferred to the Parish Council for the provision of new village recreation space which is currently lacking in Sutton. The allocation site is well related to the village and is bound on two sides by built form. Site access can be provided onto Old Yarmouth Road where there is good visibility in both directions. We consider that a pedestrian footpath link could be provided within the highway curtilage and within a shared surface road if necessary. The site would provide a well contained and sustainable small-scale extension to the village that would provide significant community benefits.	
Sutton	SUT02/A	Firs Farm Partnership Lanpro Rejzek, Ms Becky (1218497 1218496)	LP805	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The proposed allocation site is located towards the southern end of the village of Sutton which is identified within the First Draft Local Plan Part 1 as suitable and capable of accommodating small scale (in the order of 20 dwellings) new residential development, based upon its current local service provision. The previously submitted site plan demonstrates how up to 31 dwellings can be accommodated on the proposed allocation site. Whilst slightly in excess of the number suggested appropriate for small scale growth villages within the Draft Local Plan Part 1, it will deliver a sufficient number of homes to facilitate the provision of land to accommodate a new IDB pumping station which will provide surface water drainage improvements for the village and water quality improvements within the Ants Broads and Marshes SSSI as explained within the Supplementary Drainage Report. It is the only potential housing site within the village that can offer these benefits. In addition, it will enable an area of land within the site to be transferred to the Parish Council for the provision of new village recreation space which is currently lacking in Sutton. The allocation site is well related to the village and is bound on two sides by built form. Site access can be provided onto Old Yarmouth Road where there is good visibility in both directions. We consider that a pedestrian footpath link could be provided within the highway curtilage and within a shared surface road if necessary. The site would provide a well contained and sustainable small-scale extension to the village that would provide significant community benefits.	Comments noted: Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

	Number Received	Summary of Responses (Alternatives Sites in Sutton)
Objection	0	Comment set out that the site could provide a sustainable residential development that would also bring significant public benefits.
Support	0	
General Comments	2	

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First Draft Local Plan (Part 1)

Regulation 18 Stage Public Consultation

**Appendix E: Schedule of Representations -
Comments on Interim Sustainability Appraisal Reports &
Habitats Regulations Assessment Report**

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Notes

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

The following tables provide a summary of the comments submitted to the Council as part of the **First Draft Local Plan (Part 1)** document consultation on the Interim Sustainability Appraisal Scoping and Sustainability Reports along with those received on the Interim Habitat Regulation Report.

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

'OFFICER SUMMARY - SEE ATTACHED FILE FOR FULL SUMMARY:' This wording is used throughout the document. It applies in two scenarios where either:

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

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

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

First Draft Local Plan (Part 1)

**Comments on Interim Sustainability Appraisal Reports
& Habitats Regulations Assessment Report**

Document	Name & Consultee ID	Ref	Nature of Response	Summary of Comments	Council's Response
Sustainability Appraisal	Norfolk County Council/ Historic Environment (931093)	LP739	Support	<p>4.6 Landscape, Townscape and the Historic Environment This section provides a good summary of the baseline information for the historic environment. It highlights the importance of non-designated heritage assets as well as designated heritage assets which is welcomed and links into with other parts of the Plan.</p> <p>6. Table 4 suggested changes in red SA9: To protect, manage and where possible enhance the historic environment and their settings of heritage assets including addressing heritage at risk</p>	Consider feedback in the review and finalisation of the SA Objectives
Sustainability Appraisal	Norfolk Police (1217249)	LP734	General Comments	<p>First Draft Local Plan (Part 1) - Interim Sustainability Appraisal (Pg.134)</p> <p>10. Evaluation of Significant Effects SA Objective: SA11 to reduce crime and fear of crime Typo - Mitigation Proposal: The design policies and the North Norfolk Design Guide reflect Secure by Design principles. Should read: Secured by Design As per accompanying email please find comments for:</p>	Noted- correct typo within SA Objective SA 11 to stated 'Secured by Design' not 'Secure by Design'
Habitats Regulations Assessment	RSPB (1217391)	LP379	General Comments	Natura 2000 and European Sites are the same. It is recommended that one term only is used and repeated throughout the Local Plan	Noted - consider the use of only one term throughout the HRA and Local Plan
Sustainability Appraisal	Adams (1215905)	LP589	General comments	This plan covers up to 2036. The percentage of the population brought up with computers and smart phones will increase dramatically. The use of electric, maybe autonomous vehicles will increase making traveling easier without impacting on sustainability. Online shopping and home deliveries will increase. Internet access to medical services will increase. Many of the criteria currently used to determine "sustainability " will diminish in importance or disappear completely. Hopefully this will make it easier to offer greater flexibility and enable more people to achieve what they would like.	Noted. The SA objectives are informed by a base line evidence review which identifies the key issues affecting the District. The production of the final SA report is iterative and will be informed by the base line evidence.

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