

Planning Policy & Built Heritage Working Party



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Friday, 30 October 2020

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held remotely via Zoom on **Monday, 9 November 2020 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 Democratic Services no later than 5pm on the Thursday before the meeting and provide a copy of the question or statement. An email invitation will be sent to you. Statements should not exceed three minutes. Email: democraticservices@north-norfolk.gov.uk

The meeting will be broadcast live to YouTube and will be capable of repeated viewing. The entirety of the meeting will be filmed except for confidential or exempt items. If you attend the meeting and make a representation you will be deemed to have consented to being filmed and that the images and sound recordings could be used for webcasting/training purposes.

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 J Punchard and Dr C Stockton

Substitutes: Mrs A Fitch-Tillett, Mrs W Fredericks, Mr A Varley

All other Members of the Council for information.
Members of the Management Team, appropriate Officers, Press and Public



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

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

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A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

(Pages 1 - 4)

To approve as a correct record the Minutes of a meeting of the Working Party held on 12 October 2020.

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. LOCAL PLAN DRAFT POLICIES ECN4: RETAIL AND TOWN CENTRE DEVELOPMENT, ECN5: SIGNAGE AND SHOPFRONTS

(Pages 5 - 26)

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final versions of Policy ECN4: Retail and Town centre development & ECN5: Signage and Shopfronts.

Recommendations: **1. It is recommended that Members endorse revised Policies, ECN4, ECN5, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies and policies mapping to the Planning Manager.**

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

8. LOCAL PLAN DRAFT POLICIES ECN1: EMPLOYMENT LAND; ECN2: EMPLOYMENT AREAS, ENTERPRISE ZONES & FORMER AIRBASES POLICY; AND ECN 3: EMPLOYMENT DEVELOPMENT OUTSIDE OF EMPLOYMENT AREAS (Pages 27 - 56)

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final versions of Policies ECN1: Employment Land; ECN2: Employment Areas, Enterprise Zones & Former Airbases Policy; and ECN 3: Employment Development Outside of Employment Areas

Recommendations: **1. It is recommended that members endorse the revised Policies ECN1, ECN2 and ECN3 recommending to cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone and email: James Mann, Senior Planning Officer, 01263 516404 James.mann@north-norfolk.gov.uk Iain Withington, Planning Policy Team Leader, 01263 516034 iain.withington@north-norfolk.gov.uk	

9. LOCAL PLAN DRAFT POLICIES ECN6: NEW BUILD TOURIST ACCOMMODATION, STATIC HOLIDAY CARAVANS & HOLIDAY LODGES & EXTENSIONS TO EXISTING SITES; ECN7: USE OF LAND FOR TOURING CARAVAN & CAMPING SITES; ECN 8: NEW-BUILD & EXTENSIONS TO TOURIST ATTRACTIONS; AND ECN 9: RETAINING AN ADEQUATE SUPPLY & MIX OF TOURIST ACCOMMODATION (Pages 57 - 106)

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final versions of Policy ECN6: New Build Tourist Accommodation, Static Holiday Caravans & Holiday Lodges & Extensions to Existing Sites; Policy ECN7: Use of Land for Touring Caravan & Camping Sites; Policy ECN 8: New-Build & Extensions to Tourist

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

Recommendations: **1. It is recommended that members endorse the revised Policies ECN6, ECN7, ECN8 and ECN9 recommending to cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone and email:	
James Mann, Senior Planning Officer, 01263 516404 James.mann@north-norfolk.gov.uk	
Iain Withington, Planning Policy Team Leader, 01263 516034 iain.withington@north-norfolk.gov.uk	

10. LUDHAM AND STALHAM STAITHE CONSERVATION AREA APPRAISALS AND MANAGEMENT PLANS 2020 (Pages 107 - 192)

Summary: This report seeks approval for the Ludham and Stalham Staithe Conservation Area Appraisals and Management Plans in line with national policy and best practice.

Recommendations: That the appraisals as set out within the body of this report be considered and taken forward for adoption by Cabinet.

Cabinet Members(s)	Wards(s) Affected
All Members	All Wards
Contact Officer(s) telephone number and emails:	
Kate Knights (Historic Environment Manager The Broads Authority), 07818 053806; kate.knights@broads-authority.gov.uk	
Chris Young, 01263 516138, Chris.Young@north-norfolk.gov.uk	

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

12. 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.”

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

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

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PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 12 October 2020 remotely via Zoom at 10.00 am

Committee	Mr A Brown (Chairman)	Mrs P Grove-Jones (Vice-Chairman)
	Mr T Adams	Mr D Baker
	Mr N Dixon	Mr P Fisher
	Ms V Gay	Mr P Heinrich
	Mr J Punchard	Dr C Stockton

Members also attending:	<u>Observers:</u>
	Mr H Blathwayt
	Mrs A Fitch-Tillett
	Mrs W Fredericks
	Mr J Rest
	Miss L Shires
	Mr J Toyne
	Mrs L Withington

Officers in Attendance:	Planning Policy Manager, Planning Policy Team Leader, Senior Planning Officer, Conservation and Design Officer, Conservation and Design Team Leader, Democratic Services Manager and Democratic Services & Governance Officer (Regulatory)
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33 APOLOGIES FOR ABSENCE

None.

33 APOLOGIES FOR ABSENCE

None.

34 PUBLIC QUESTIONS

None.

35 MINUTES

The Minutes of the Working Party held on 14 September 2020 were approved as a correct record.

36 ITEMS OF URGENT BUSINESS

None.

37 DECLARATIONS OF INTEREST

Councillor C Stockton declared an interest under item 39 as he was a resident of Happisburgh and the owner of a heritage asset.

38 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

None.

39 LOCAL PLAN DRAFT POLICIES SD11: COASTAL EROSION, SD12: COASTAL ADAPTATION AND ENV3: HERITAGE & UNDEVELOPED COAST

The Chairman thanked those involved in the recovery from recent storm damage.

The Senior Planning Officer presented a report relating to draft coastal policies SD11: Coastal Erosion, SD12: Coastal Adaptation and ENV3: Heritage & Undeveloped Coast, which summarised the feedback received in response to the Regulation 18 public consultation and the Officer responses, and recommended that Cabinet endorse the policy approaches as set out in the report.

Councillor Mrs A Fitch-Tillett, Coastal Portfolio Holder, requested an amendment to the recommendation to delegate responsibility for drafting the policy approach, including that of finalising the associated policies, to the Planning Policy Manager in conjunction with Coastal Manager. She stated that she was very proud of the document, and was relieved that coastal erosion and adaptation were covered in depth in the new policies. She explained that the protection of the coast was not always possible for engineering and cost reasons, and coast protection schemes must not have a wider impact on the coast. She stated that adaptation allowed communities to thrive, and referred to schemes that had been undertaken in Happisburgh that had benefited the village. She referred to paragraphs 166 and 167 of the NPPF as being particularly relevant.

Councillor Ms V Gay asked how geology had been addressed in the policy.

Councillor Mrs Fitch-Tillett stated that the effect of ground water pushing the cliffs outwards caused coastal erosion, and not the sea itself. She referred to a report from the British Geological Survey which the Coastal team would be happy to share.

The Officers explained that it had not been considered necessary to use the word 'geology' specifically in these policies, but it would be included as part of the coastal and adaptation supplementary planning document. Express reference would be made to geological interests in Policy ENV4: biodiversity and geology, which was an overarching policy that would apply across all development proposals. Policy ENV4 would be brought to the Working Party at a later date.

Councillor D Baker requested officer comments on a representation from Timewell Properties, which was a large employer in the area.

The Planning Policy Manager stated that the general thrust of the representation was for flexibility in the principles of roll back, to reflect the difficulties of rolling back large pre-existing uses such as caravan sites, and specifically to allow roll back within the risk area albeit mitigating that risk by locating further back from the cliff top. In his opinion, it was better to keep the policy as written and treat such applications as an exception to the policy where there was evidence to justify the exception.

The Senior Planning Officer explained that the reason for lengthening the time period in which properties were at risk was to allow for long term planning for relocation.

The Planning Policy Team Leader explained that the proposed policy was a strategic approach against which proposals would be judged. Tourism policies for caravan

sites and static caravans would come forward to a future meeting. Whilst those policies would seek to relocate caravans outside the Coastal Change Management Area, they would also allow for movement within it provided proposals took into account landscape and amenity.

Councillor C Stockton stated that he should have declared an interest at the beginning of the meeting as he was a resident of Happisburgh and the owner of a heritage building. He stated that one of his greatest concerns was the loss of irreplaceable heritage. There were three listed heritage buildings in Happisburgh that would be at risk from coastal erosion in the immediate future, including the Grade I listed Norman church. It was important to consider how those assets could be recorded to ensure they were not entirely lost and that future generations could see what had been there. Heritage was extremely important, but was not always taken into consideration as it was difficult to put a price on it.

It was proposed by Councillor A Brown, seconded by Councillor P Heinrich and

RESOLVED unanimously

That the recommendation be amended to include delegation to the Coastal Manager.

It was proposed by Councillor A Brown, seconded by Councillor Mrs P Grove-Jones and

RECOMMENDED unanimously

That Cabinet endorses the revised Policies SD11: Coastal Erosion, SD12: Coastal Adaptation and ENV3: Heritage & Undeveloped Coast and delegates responsibility for drafting such an approach, including that of finalising the associated policies, to the Planning Policy Manager and Coastal Manager.

40 PROGRESS ON NORTH WALSHAM WESTERN EXTENSION

The Planning Policy Manager gave a verbal update on progress on the North Walsham Western Extension. He reported that there had been progress on the first draft of a highway evidence document in respect of the impact on the local highway network and it had now gone back to the consultants for clarification. The promoter had prepared an overarching viability assessment which indicated that the scheme was broadly viable. Discussions were taking place with the landowners of adjacent land which was critical to the delivery of the scheme. A revised visioning document had been prepared which established a broad set of visionary principles for the development brief. The draft development brief would be produced over the next few weeks, following which public consultation would be carried out.

41 GLAVEN VALLEY CONSERVATION AREA APPRAISALS & MANAGEMENT PLANS 2020

The Conservation and Design Officer presented a report in respect of Conservation Area Appraisals and Management Plans for Baconsthorpe, Glandford, Hempstead, Holt and Letheringsett. She outlined the changes to the Conservation Area boundaries and local listings. She informed the Working Party that it was intended to carry out public consultation in January and February in order to avoid the Christmas period and in the hope for more clarity regarding the situation with Covid-19. Whether or not a public exhibition could be held as part of the process would

depend on Government advice at the time and it may be necessary to consider other options. Following consultation, comments would be considered and amended documents brought to the Working Party in April 2021 for approval and recommendation to Cabinet for adoption.

Councillor Mrs P Grove-Jones considered that that the documents were very good. However, whilst she appreciated that Conservation Areas should be kept as pure as possible, it was very costly to replace timber windows and difficult to find someone who could make an exact copy of the original. She considered that uPVC replacements could be acceptable in buildings of lesser importance if the original design could be copied.

Councillor C Stockton drew attention to paragraph 1.2 of the Officer's report which listed in detail the reasons why heritage was important.

Councillor D Baker stated that two of the Conservation Areas were within his Ward, and he totally agreed with the report.

It was proposed by Councillor P Heinrich, seconded by Councillor D Baker and

RECOMMENDED unanimously

- 1. That Cabinet approve the draft Conservation Area Appraisals for Baconsthorpe, Glandford, Hempstead, Holt and Letheringsett for public consultation.**
- 2. That following consultation, the amended appraisals be brought back to the Planning Policy & Built Heritage Working Party for consideration and subsequent adoption by Cabinet.**

The meeting ended at 11.00 am.

Chairman

Local Plan Draft Policies ECN4: Retail and Town centre development, ECN5: Signage and Shopfronts

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final versions of Policy ECN4: Retail and Town centre development & ECN5: Signage and Shopfronts.

Recommendations: **1. It is recommended that Members endorse revised Policies, ECN4, ECN5, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies and policies mapping to the Planning Manager.**

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

1. Introduction

1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced, which will determine if the Draft Plan is sound, with or without further modifications, following which the Plan can be formally adopted by the Council.

1.1 This report focuses on the approach to retail and town development principles, and discusses the feedback from the regulation 18 consultation along with and national policy changes and the supporting evidence contained in the North Norfolk Retail and Main Town Centres Uses Study 2017.

- 1.2 **The purpose** of this report is following a review of the regulation 18 consultation feedback to seek Members endorsement of the final suit of policies that address retail and town centre development matters for future Plan making ahead of the Regulation 19 consultation and then submission of the Plan.

2. Background and Update

- 2.1 The new Local Plan includes a number of policies relating to retail and town centre uses. Such policies are intended to promote Town Centres and aid the vitality and viability of our towns. Any policy requirements should be in line with the national policy approach detailed in the National Planning Policy Framework and the associated Planning Practice Guidance, should be based on local evidence, and should be deliverable (viable) during the plan period.
- 2.2 The purpose of Policy ECN4 is to set out the policy framework in order to guide retail development in a sustainable manor across the District and sequentially within the selected towns, specifically to maintain and enhance the viability and sustainability of the District's town centres. It does this by establishing a retail hierarchy, seeks the provision and retention of local services at appropriate scales and locations, seeking to improve public realm and connectivity, and sets locally derived impact thresholds for the assessment of proposals that cannot be accommodated in the primary shopping area for retail and town centre for other uses.
- 2.3 Policy ECN5 is a new policy setting out the principles that proposals for new signage and shopfronts (new and or replacement) should follow. The purpose is to is provide a policy base in order to seek to avoid the proliferation of advertisements in sensitive locations, such as in Conservation Areas and rural locations or locations which have high visual amenity, where it is considered that the amenity of the locality will be impaired, and to ensure new and replacement shopfronts are well designed to reflect the character of the surrounding area and enhance the visual amenity of the local area.

3. Feedback from Regulation 18 consultation

- 3.1 All of the Regulation 18 consultation feedback has been published in the Schedule of Responses, previously reported to Members. For information, the summary feedback for the three draft policies is contained within Appendix 1 to this report. The key comments and issues raised are summarised below for each draft policy:

Policy ECN4. Retail and Town centre development

- 3.2 Individuals: Six responses were received from the general public on this policy. Although three objected, no substantial land use issues were raised. Comments acknowledged that the high street is changing, and suggested that digital technologies should be embedded in town centres, alongside places where people can work and live, potentially above shops. One comment asked why only 10 year expenditure projections were published while another sought no more supermarkets due to the heavy carbon cost of food wastage. There was a preference for town centre and brown field development first.

- 3.3 Parish and Town Councils: Two general comments were received from Cromer and Sheringham town Councils. Sheringham Town Council were keen for the policy to limit the development of floorspace for food and beverage, while Cromer TC sought further encouragement for securing public works of art in order to improve the public realm. North Walsham TC objected to the policy and sought greater protection in the policy to restrict retail losses and residential development. All town councils considered that the PSA should be extended mainly to include all existing shops and in order to seek greater protection from change.
- 3.4 Statutory Bodies and Organisations: Responses included those from Norfolk County Council (NCC), The Broads Authority, Kelling Estate and Trinity College Cambridge. The approach was largely endorsed by those that responded. NCC commented that the policy was broadly in line with national policy town centre first and complemented the aspiration of transport and public realm improvements in town centres. Kelling Estate sought greater flexibility towards retail development in the countryside. Trinity College as landowners of the existing allocation to the north of the Fakenham sought an uplift in the impact threshold for the town in order to lower the tests for further out of town provision.

Policy ECN 5: Signage and Shopfronts

- 3.5 Limited feedback was received in relation to this policy, no comments were received from Parish and Town Councils and only one from a statutory/organisation Consultee – Norfolk Coast Partnership. The policy approach was supported as it was felt that *Signage has been neglected over the years and...was an important element in the appeal of our towns...* As such feedback asked for further consideration to the strengthening of the policy wording in terms of compliance with the council's design guide and to consider further the impact of lighting on visual amenity.

4. **National Policy**

- 4.1 The focus of national policy remains firmly towards maintaining town centres as the location where defined town centre uses¹ should be directed, with a defined Primary Shopping Area(PSA) being the area where retail development is concentrated. This PSA is the area where new retail development should first be directed and the boundary is the determining factor in establishing, centre, edge of centre, and out of centre locations in relation to retail policies. National policy gives priority to central locations for new town centre developments but allows for the consideration of further appropriate edge of centre sites that are well connected and then out of centre sites as long as they are not outside the urban area, (the sequential approach). The national requirement to apply the sequential test discourages out of centre development if there are suitable and available sites at the edge of a centre or in a town centre itself. Applicants and the Council should show flexibility on issues such as format and scale, so that opportunities to utilise town centre, or edge of centre sites are fully considered before contemplating

¹ Main Town Centre Uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). NPPF, 2019

out of centre locations. The PSA is not an area of protection, significant permitted development (PD) rights now exist for change of uses and policies that seek to control retail frontages in terms of their use class are no longer supported nationally.

4.2 The general aim of the NPPF is outlined in paras 85 – 90 where emphasis is placed on defining policies that support the role of town centres and taking an active and positive approach to their management and adaptation: This can be summarised:

- Define a network & hierarchy of town centres and the relationship between them in order to promote long term vitality and govern decisions on the scale of development that would be appropriate to each town centre;
- Define the extent of the town centres and primary shopping areas, making clear the range of uses permitted in such locations;
- Look at least ten years ahead in seeking to meet anticipated needs for retail, leisure, office and other main town centre uses;
- Apply the sequential test to proposals that are for main town centre uses as defined in the NPPF and not in an existing centre;
- Set out any locally derived and proportionate impact thresholds and requirements for assessment of the impacts on the town centre in association with development proposals outside town centres. i.e the impact of a proposal on existing, committed and planned investment in centres and wider catchment , customer choice and wider vitality and viability;
- Recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.

Paragraph 90 states that: *Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the considerations in paragraph 89², it should be refused*

4.3 The national Planning Practice Guidance, PPG, indicates that development Plans should develop town centre strategies, based around flexibility and the scale of need for main town centre uses, but also ones that remain appropriate and realistic to the role of centres in the hierarchy.

4.4 A broad range of national permitted development rights now also exist in relation to town centre development and the national PPG has recently been updated to reflect national policy changes to the General Permitted Development Order, GDPO. Some permitted development rights allow the change of use without any application process while other permitted development rights now allow for a change of use subject to prior approval but on specific planning matters only. This includes the following table as detailed in the Planning Practice Guidance.

² NPPF para 89 outlines considerations of an impact test including but not limited to an assessment of: a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

Permitted change of Use without any application process	Permitted change of use subject to prior approval
From shops to financial and professional services uses, such as a bank	From shops and financial and professional services, a betting shop or pay day loan shop to a restaurant or café
From financial and professional services, a betting shop or pay day loan shop to a shop;	From shops and financial and professional services, a betting shop or pay day loan shop to an assembly and leisure use;
From a betting shop or pay day loan shop to financial and professional services,	From shops, financial and professional services, a betting shop, pay day loan shop, launderette, and hot food takeaway premises to office use;
From a restaurant or café, or a hot food takeaway to a shop or financial or professional services;	From shops, financial and professional services, a betting shop, pay day loan shop, launderette, and hot food takeaway premises to residential use;
From a hot food takeaway to a restaurant or café;	From amusement arcades / centres or casinos to residential use;
From a shop, financial and professional services, betting shop or pay day loan shop with two flats above.	From offices to residential use.

Source: Paragraph: 007 Reference ID: 2b-007-20190722 revision date 18.9.2020 . Further detail on these rights are set out in the [Town and Country Planning \(General Permitted Development\) \(England\) Order 2015, as amended](#).

- 4.5 To support new ventures and pop-ups and to encourage the take up of empty units a separate permitted development right has also been introduced. This allows the temporary conversion of offices, shops, restaurants and cafes, hot food takeaways, assembly and leisure uses and professional and financial services to convert to another use for a continuous period of up to three years. i.e. existing empty premises can therefore be used for shops, offices, restaurants etc.
- 4.6 This approach not only sees the take up of empty units but allows for start up to test the market and ensures a greeter mix in the high street and provides development rights designed to allow adaptation to market conditions such as hard surfacing for restaurants to support outdoor use and alterations to allow click and collect facilities in shops.
- 4.7 Collectively these measures have the potential to bring a greater variety of town centre uses ensuring the greater footfall and longer term vitality of town centres. They also however have the potential to limit the ability of local authorities and of local communities, through neighbourhood planning, to plan for town centres and there are limits to the policy controls the Council can seek to implement.
- 4.8 Across the District's market towns these changes may result in the erosion of the traditional retail concentration found in many of the identified primary shopping areas. On the other hand, it may lead to increased variety and reinforce the role of the market towns as service centre and boost the night-time economy and retail / tourist mix.

5. **Conclusions**

ECN4 Retail and Town Centre Development

- 5.1 The District has a well-established shopping hierarchy with large town centres in Cromer, Fakenham and North Walsham providing for a significant proportion of shopping and these remain the main focus for retail and leisure development and offer the best prospects for attracting investment and multiple operators. These towns are geographically spread across the District, are the main centres of population, have better quality public transport, the critical mass to encourage joint shopping trips, and opportunities for development.
- 5.2 Smaller town centres should complement the larger town centres, by providing for convenience food shopping and lower order day to day comparison shopping facilities and other services. In line with the development strategy, and distribution of growth in the wider Local Plan, local/village centres should cater for top-up and local day to day needs. The smaller town centres of Holt, Sheringham, Hoveton, Stalham and Wells-next-the-Sea in the District serve smaller catchments and to varying degrees have developed a particular niche market role, are dependent upon the seasonal influx of tourists, and retain their locally distinctive small shop character. Disproportionately large scale development in these smaller towns may have an adverse impact on their character and thus diminish their attractiveness as tourist destinations. Furthermore, such developments may encourage unnecessary car journeys from the larger towns. Consequently, it is considered that developments here should be smaller in scale and should be designed to meet identified needs in the town and its immediate surroundings. Functionally, the central location of Holt, Sheringham and Cromer in the District means that they often complement each other. The 2017 Retail and Town centre study demonstrates that the primary catchment areas of these towns overlap with residents utilising the retail opportunities for both comparison and convenience in all three centres. As a consequence it is recommended that any out of centre proposals should therefore look at impacts on all three centres.
- 5.3 The 2017 Town Centre and Retail study reviewed retail expenditure growth across the District, including tourist spend and population growth in order to establish the expenditure capacity to support future retail floorspace growth. In line with the NPPF requirements it did so over a 10 yr period and the study itself included further projections up to 2036. The 10 year figures were published as part of the Regulation 18 consultation and remains the most up to date and robust evidence document. In doing so the quantitative and qualitative assessment identified a high level of “expenditure leakage” to higher order centres with the key driver being limited choice in the District’s centres. In terms of convenience shopping and the provision of food and beverage outlets there is good provision with a strong offer across the District. North Walsham remains the only higher order town that could accommodate investment at a modern scale of supermarket operation, while there is projected additional expenditure to support comparison goods growth in Cromer and Fakenham and a lesser extent North Walsham by 2026, although to a limited extent. The evidence supports the approach consulted on, one that is focused on the accommodation of growth through the uptake of vacant units and through the development/redevelopment of existing town centre sites. The approach also seeks to restrict residential growth to that of upper floors, thus ensuring premises remain available for appropriate retail and office development. As such the policy approach remains one of a sequential and criteria approach designed to ensure development best meets the needs and aspirations of North Norfolk and does not warrant identification of specific retail allocations. The possible exception is North Walsham where

the proposed allocation of a western sustainable extension is being informed by a development brief to guide suitable land use proposals.

- 5.4 The default position in national policy with regards the requirement for an impact assessment for applications for retail, office and leisure remains 2,500sqm gross. This is significantly over the identified expenditure capacity to support floorspace projections in our towns over the entire Plan period and it remains that the impacts of much smaller development proposals would need to be understood. Given this and the fragility of some of the town centres it is considered essential that the smaller thresholds are continued to be proposed in the Local Plan policy in line with the supporting evidence in the Retail Study. Any impact assessment will also need to review the impacts on the functional links between centres and not just on the town centre closest to the proposal.
- 5.5 The importance of maintaining and enhancing village service and facilities in rural communities is also recognised. It is also important not only to protect existing facilities, because in a large rural area, such as North Norfolk, but the loss of the last remaining convenience store, public house or important facility in a village, or even a small town, can have a significant impact upon the ability of local residents to access services and the wider sustainability of the rural villages. As well as increasing the need to travel, the loss of services can threaten the viability and vitality of rural communities and could affect in the future matters such as the identification of growth villages in any revised Plan hierarchy.
- 5.6 The provision and retention of local facilities and services is covered in a separate policy SD6. Its purpose is to allow for new community facilities and services in sustainable locations and to prevent the premature loss of important local facilities where their continued use is considered to remain a viable prospect. The approach complements SD2: Community-Led Development which Members will recall makes clear the Council's support for various types of development proposals which are led by, and have the support of the local community, and which may not comply with some aspects of the Plan, provided it is demonstrated that the development proposes is needed and makes a lasting and meaningful contribution to the vitality of the community. Schemes could include affordable housing but also Shops, pubs and small business. Both SD2 and SD6 were previously endorsed by Members at the March working party.
- 5.7 Outside identified town centres the approach is to respond positively to appropriate small scale growth opportunities through conversion and extension
- 5.8 The policy approach is considered to reflect local circumstances, align to national policy and be supported by appropriate evidence. Much of the feedback sought the policy to provide additional controls and or increased presumptions which national policy outlined above does not allow and it is concluded that no major alterations to the draft policy are required. Some minor amendments to reflect comments and ensure clarity are however incorporated and set out in Appendix 2.
- 5.9 The PSA's have been revised in order to better align with the definition and where appropriate in relation to the feedback and previous Members comments. Minor amendments are proposed to the PSA in Cromer and Stalham which reflect the higher concentrations of retail units in those locations which are contiguous to the current PSA.

ECN5 Signage and Shopfronts

- 5.10 The policy is a new and specific policy to help ensure greater consideration is given to street scene, amenity value and the historic nature of many of the Districts high streets in relation to shop frontage and signage. The feedback from the Regulation 18 consultation sought to give increased weight to the Council's design guidance and, as such, the policy is amended (as set out in Appendix 2) to be in line with Policy ENV9 High Quality Design, which seeks applicants to demonstrate conformity to the design principles set out in the Council's Supplementary Planning Guidance and other design guidance endorsed by the Council in this regard. The review of the design policy is yet to come before Members of this working party and any changes to this aspect of the approach will be followed through into ECN5 if endorsed.

6. **Recommendations**

- 6.1 **It is recommended that Members endorse revised Policies, ECN4, ECN5, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies and policies mapping to the Planning Manager.**

7. **Legal Implications and Risks**

- 7.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by up to date and proportionate evidence, the application of a consistent methodology and take account of public feedback and national policy and guidance.
- 7.2 The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

8. **Financial Implications and Risks**

- 8.1 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.

Appendices

Appendix 1 – Schedule of Representations with comments
Appendix 2 – Revised Policies

Appendix 1 - Schedule of Representations

Extract of Report of Representations

References to 'Officer Summary' indicate that lengthier submissions were made and have been summarised.

Policy ECN4 Regulation 18 Reponses.

Individuals

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 hour's 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, and increase overall health and wellbeing.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN4	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.
ECN4	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	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.
ECN4	Johnson, Mr & Mrs (1215700)	LP143	Support	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.
ENC4	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	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 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.

Parish and Town Councils

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					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 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.

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	

Organisations and Statutory Consultees

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					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	

Responses on Alternatives

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).
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Policy ECN5 Regulation 18 Responses.

Individuals

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

Parish and Town Councils

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

Organisations and Statutory Consultees

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	

Alternatives

No comments received

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Regulation 19 Retail Section

Policy ECN4 Retail and Town Centre Development

The purpose of this policy is to maintain and enhance the vitality, viability and sustainability of the District's town centres.

The policy seeks to enhance local provision within centres and encourage local sustainable shopping patterns by addressing high levels of expenditure leakage to outside areas and encouraging retail and investment into higher order towns through the use of the sequential test and the setting of locally derived impact test thresholds.

The District has a well-established shopping hierarchy with large town centres in Cromer, Fakenham and North Walsham providing a significant proportion of shopping. These towns are geographically spread across the District, are the main centres of population and focus for residential development, have better quality public transport, the critical mass to encourage joint shopping trips, and opportunities for development. They are therefore well placed to meet the shopping and service needs of a significant proportion of North Norfolk's population and visitors to the area and are the focus of any large scale new development.

Smaller town centres complement the larger town centres, by providing for convenience food shopping and lower order day to day comparison shopping facilities and other services. The local/village centres cater for top-up and local day to day needs. The smaller town centres at Holt, Sheringham, Hoveton, Stalham and Wells-next-the-Sea serve smaller catchments and to varying degrees have developed a particular niche market role. They are partly dependent upon the seasonal influx of tourists, and retain their locally distinctive small shop character. Disproportionately large scale development in these smaller towns may have an adverse impact on their character and thus diminish their attractiveness as tourist destinations. Furthermore, such developments may encourage unnecessary car journeys from the larger towns. Consequently, it is considered that developments here should be smaller in scale and should be designed to meet identified needs in the town and its immediate surroundings. Functionally, the central location of Holt, Sheringham and Cromer in the District means that they often complement each other and the primary catchment areas of these towns overlap with residents utilising the retail opportunities for both comparison and convenience in all three centres.

Development of additional retail floorspace outside of the town centres will normally be resisted, particularly where vacancy rates are high and opportunities exist within and close to town centres to accommodate retail development. The role of Local Service Centres will be maintained, by responding positively to appropriate small scale growth opportunities through conversion and extension, and through environmental improvements and seeking to restrict the loss of services, whilst also supporting development to preserve and enhance the settlement's vitality and viability. The diversification and broadening of the economic base is supported. The approach recognises the importance of village shops to rural communities and supports proposals for the conversion or extension of shops that are designed to improve their viability.

A broad range of national permitted development rights now exists in relation to town centre development. Some permitted development rights allow the change of use from shops and financial institutions without any application process while other permitted development rights now allow for a change of use subject to prior approval but on specific planning matters only: In the towns residential development in the form of change of use will be supported in Primary Shopping Areas

where it is provided above ground floor level and does not result in the loss of a retail use at street level.

Parts of Hoveton town centre spans Local Authority boundaries and falls under the Broads Authority Administrative Area. The Local Planning Authorities have jointly agreed their respective approaches to the shared town centre and any proposal will need to be considered in the context of the whole town centre and policies contained in the relevant Development Plan.

The 2017 North Norfolk Retail and Main Town Centres Uses Study undertook a qualitative and quantitative assessment of the Districts Town centres and established the base line position with regards expenditure growth available to support new retail floor space across the district. These projections will be updated through the Annual monitoring report.

Table X Projected retail floorspace requirement 2016 – 26.

Town	Convenience Goods (Sg.M Gross)	Comparison Goods (SM.M Gross)	Food & Beverage (Sq.M Gross)
Cromer	0	1,182	253
Fakenham	0	1,042	228
Holt	0	297	196
North Walsham	1,124	559	161
Sheringham	588	457	268
Hoveton/(Wroxham)*	0	342	88
Stalham	323	137	53
Well-next –the-Sea	11	84	96
Other North Norfolk	0	268	433

*combined figures Broads Authority

Local derived impact thresholds address the fragility of the Districts town centres and the disproportionate nature of the default national threshold contained in the NPPF. Collectively the impacts of small scale proposals needs to be considered. Consequently proposals will need to demonstrate their impacts on existing, committed and planned public and private investment in a centre(s) and the wider functional catchment area (as applicable to the scale and nature of the proposal) as well as town centre(s) vitality and viability, local consumer choice in the short and medium term 5- 10 yrs. Given the function links and overlapping catchment areas of Holt, Sheringham and Cromer any proposal requiring an impact assessment in these wider areas will need to consider the impacts on all three centres.

Policy ECN4: Retail & Town Centres Centre Development

Support will be given for maintaining and enhancing the vitality and viability of the following hierarchy of town centre and local centres:

Settlement	Description
Cromer, Fakenham & North Walsham	Large Town Centres - serves the District and beyond and the main focus for retail and leisure development
Holt, Hoveton, Sheringham, Stalham and Wells-next-the Sea	Medium Town Centre & Tourist Centres - provide a range of services for local residents, their rural Hinterland and tourists

<p>Service Villages and Small Growth Villages</p>	<p>Local Centres – provide for basic or everyday local needs and for their immediate rural catchment</p>								
<ul style="list-style-type: none"> Proposals for retail and other town centre development of a scale appropriate to these roles and in sustainable locations will be supported in each Large and Small Growth Towns, provided that development respects the character of the centre, including its special architectural and historic interest, and assists in maintaining its existing retail function. Proposals for convenience and comparison goods provision, of an appropriate scale, which aids the vitality and viability of Cromer, Fakenham and North Walsham town centre will be considered favourably, provided that proposals reflect the identified capacity to support growth as established in the Retail & Town Centre Study and other appropriate evidence and seeks to enhance and broaden the retail offer. Site selection for retail and other town centre uses should follow national policies and guidance. Town Centre boundaries & Primary Shopping Areas are shown defined on the Policies Map (*). Development proposals for retail development, which are located between the Primary Shopping Area (PSA) and the Town Centre Boundary will be supported only where it is demonstrated that the proposal cannot be suitably accommodated within the PSA and will bring positive economic regeneration benefits. <p>Support for out-of-centre development will be dependent on how it reflects the capacity available to support the proposal as identified in the retail study and subsequent permissions, how it seeks to enhance expenditure retention and in relation to the assessment of impacts on the town centre** and wider retail catchments is in accordance with the locally derived impact thresholds below.</p> <table border="1" data-bbox="304 1126 1385 1312"> <thead> <tr> <th data-bbox="304 1126 794 1167">Settlement</th> <th data-bbox="798 1126 1385 1167">Impact Threshold</th> </tr> </thead> <tbody> <tr> <td data-bbox="304 1171 794 1205">Cromer & Fakenham</td> <td data-bbox="798 1171 1385 1205">1,000sqm gross and over</td> </tr> <tr> <td data-bbox="304 1209 794 1272">North Walsham, Sheringham Holt & Hoveton</td> <td data-bbox="798 1209 1385 1272">500sqm gross and over</td> </tr> <tr> <td data-bbox="304 1276 794 1312">Stalham, Wells-next-the Sea</td> <td data-bbox="798 1276 1385 1312">250sqm gross and over</td> </tr> </tbody> </table>		Settlement	Impact Threshold	Cromer & Fakenham	1,000sqm gross and over	North Walsham, Sheringham Holt & Hoveton	500sqm gross and over	Stalham, Wells-next-the Sea	250sqm gross and over
Settlement	Impact Threshold								
Cromer & Fakenham	1,000sqm gross and over								
North Walsham, Sheringham Holt & Hoveton	500sqm gross and over								
Stalham, Wells-next-the Sea	250sqm gross and over								
<ul style="list-style-type: none"> Proposals for Hoveton/Wroxham will be considered in the context of the entire town centre and the policies of the relevant Broads Authority Development Plan so that retail and main town centre uses proposals address the town centre in its entirety. Proposals for residential development within town-centre Primary Shopping Areas locations will be considered favourably provided that they are above ground floor level. Such proposals should include a separate and secure access, preferably to the rear of the property, which does not result in a net loss of ground floor retail space. Proposals are expected to respect their surroundings, contribute positively to the visual amenity of their locality and provide public realm improvements and wider public benefit to the area and surroundings such as: <ul style="list-style-type: none"> enhanced accessibility and connection between urban spaces; improvements to streetscape, lighting, signage, paving and street furniture and public art; improvements to the pedestrian and cycle environment; complementary surfacing and hard landscaping materials; incorporate tree planting and green infrastructure, wherever possible; innovative design and improvements in local design quality that help to develop a strong local identity and sense of place in accordance with the North Norfolk Design Guide. 									

- Outside **identified** town centres, in **designated** Service Villages and Small Growth Villages proposals for the conversion or extension of shops that are designed to improve their viability will be supported in principle.
- In the designated Countryside Policy Area proposals for small scale specialist retail services will be supported in principle only where it can be demonstrated that the proposal is to perform a wholly ancillary role to an existing or planned use and is of an appropriate and proportionate small scale.

* Maps are shown within the Town and Village Proposals section of this document ([update link](#))

** Impacts to consider include the impact on existing, committed and planned public and private investment in a centre(s) and the wider functional catchment area (as applicable to the scale and nature of the proposal) as well as town centre(s) vitality and viability, local consumer choice in the short and medium term 5- 10 yrs.

Policy ECN5 Signage and Shopfronts

The purpose of this policy is to seek to avoid the proliferation of advertisements in sensitive locations, such as in Conservation Areas and rural locations or locations which have high visual amenity, where it is considered that the amenity of the locality will be impaired and to ensure new and replacement shopfronts are well designed to reflect the character of the surrounding area and enhance the visual amenity of the local area.

Policy ECN 5

Signage & Shopfronts

Advertisements and signs (illuminated & non-illuminated) should be:

1. appropriate and relevant to the business or premises for which they have been created;
2. sensitively designed and located having regard to the character of the building on which they are to be displayed reflecting the general characteristics of the locality and **conforming with the design principles contained in the provisions of the North Norfolk Design Guide.**

The size, scale, material, colour scheme and any means of illumination selected should be **sensitive and** appropriate to the local area **and wider amenity**. In areas of historic value, such as conservation areas, particular regard should be had to any impact of the proposal on the character and appearance of the area. Proposals which obscure features of architectural or historical interest, or are uncharacteristic of a buildings design, will not be permitted.

The creation of new shopfronts, or the replacement / alteration of an existing frontage should be well designed to reflect the character of the surrounding area and seek, where possible, to enhance the visual amenity of the local area. Proposals should have regard to:

1. the existing character of the area;
2. the suitability of the overall form, scale and architectural detail in relation to the overall appearance of the building;
3. the suitability of materials in relation to the overall appearance of the building.

Proposals for advertisements and shopfronts should **respond to best practice and demonstrate that they are in conformity with the design principles set out in urban design guidance, any subsequently produced design Supplementary Planning Document adopted by the Council or other design guidance endorsed by the Council and or through neighbourhood Planning* have regard to the guidance contained in the North Norfolk Design Guide SPD.**

*this wording will be updated to reflect the final agreed wording in ENV9 High Quality Design

Local Plan Draft Policies ECN1: Employment Land; ECN2: Employment Areas, Enterprise Zones & Former Airbases Policy; and ECN 3: Employment Development Outside of Employment Areas

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final versions of Policies ECN1: Employment Land; ECN2: Employment Areas, Enterprise Zones & Former Airbases Policy; and ECN 3: Employment Development Outside of Employment Areas

Recommendations: **1. It is recommended that members endorse the revised Policies ECN1, ECN2 and ECN3 recommending to cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>James Mann, Senior Planning Officer, 01263 516404 james.mann@north-norfolk.gov.uk</p> <p>Iain Withington, Planning Policy Team Leader, 01263 516034 Iain.Withington@north-norfolk.gov.uk</p>	

1. Introduction

1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced, which will determine if the Draft Plan is sound, with or without further modifications, following which the Plan can be formally adopted by the Council.

1.2 North Norfolk has a relatively narrow economic base with a high proportion of employment in tourism, food production and retail sectors. Rates of

unemployment in the District are generally lower than elsewhere although there is a seasonal dimension to employment opportunities. Average pay rates are below both regional and national averages.

- 1.3 Rates of economic activity are also low compared to national and regional averages, reflecting the large numbers of retired people living in the District. Many younger people leave the District for increased employment prospects and because of the high cost of local housing. There is growing concern that businesses will be unable to recruit and attract suitable staff. Consequently, there is an aspiration to broaden the economy to offer a wider choice of employment opportunities and achieve a more balanced economy and population in the future.
- 1.4 Emerging policies ECN 1, ECN 2 and ECN 3 seek to provide a positive approach to employment within the District by allocating sufficient employment land and providing flexible policies to ensure the right development occurs in the right places and to ensure adaptability to changes market conditions.
- 1.5 **The purpose** of this report, is following a review of regulation 18 consultation feedback to seek Members endorsement of the final suit of policies that address tourism for future Plan making ahead of Regulation 19 consultation and then submission of the Plan.

2. Policy Background

- 2.1 The purpose of Policy ECN1 is to establish the quantum and location of existing and proposed employment land across the District. This ensures that new proposals for employment development will be directed to these designated Employment Areas and proposed Employment Allocations, as these are considered the most sustainable and suitable locations for employment uses.
- 2.2 Policy ECN 2 sets out the approach towards new employment development across the District and the types of employment proposals that will be supported on designated Employment Areas, Enterprise Zones and Former Airbase Sites. This policy also seeks to protect these areas from non-employment uses to ensure that employment land is retained.
- 2.3 Policy ECN 3 sets out the approach towards employment development outside of Employment Areas to ensure a flexible approach to employment development across the District and seeks to retain, where possible, existing employment uses that are not subject to an existing designation.

3. Feedback from Regulation 18 consultation

- 3.1 All of the Regulation 18 consultation feedback has been published in the Schedule of Responses, previously reported to Members. For information, the feedback for the three draft policies is contained within Appendix 1 to this report and summarised below. Overall, the number of responses to the policies was limited, however, the respondents did raise some key issues. The comments are summarised below for each draft policy:

Policy ECN 1: Employment Land

- 3.2 Individuals: Five individuals commented on the policy, two in support, two objections and one general comment. The objections focused around the broad approach the Council should be taking i.e. supporting the green energy sector and the lack of need for employment land given the changing economic landscape. One general comment set out that the quantum proposed should be a minimum to allow for flexible future growth across the District.
- 3.3 Parish and Town Councils: Wells Town Council in support of the retention of existing sites in Wells. Sheringham Town Council in support of retaining current employment land.
- 3.4 Statutory Bodies and Organisations: Five comments were made on the policy. These were largely supportive of the Policy approach. Trinity College stated that there should be more employment land in Fakenham given this area has had the highest take up rate. The Wells Neighbourhood Plan Group also suggested more employment land should be designated in Wells-next-the-sea.

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

- 3.5 Individuals: One general comment regarding the Great Eastern Way Industrial Estate regarding greater flexibility of employment opportunities.
- 3.6 Parish and Town Councils: None
- 3.7 Statutory Bodies and Organisations: Two general comments received on the policy. One from the Broads Authority which sets out that there may be cross-boundary issues regarding Neatishead and one from the Environment Agency to make sure that there would be no risk of surface or groundwater flood risk.

Policy ECN 3: Employment Development Outside of Employment Areas

- 3.8 Individuals: One comment in support of the policy with the caveat that this should not be at the expense of Policy HOU 06: Replacement Dwellings, Extensions and Annexed Accommodation.
- 3.9 Parish and Town Councils: None
- 3.10 Statutory Bodies and Organisations: The Environment Agency made a comment on the site regarding Bacton Gas Terminal and the need for an Environmental Impact Assessment (EIA).

4. National Policy

- 4.1 The revised National Planning Policy Framework (NPPF) was published in February 2019, which is supplemented by the Planning Practice Guidance (PPG), an online resource providing guidance on the NPPF's implementation. The relevant paragraphs in the NPPF are summarised below:

Relevant Paragraphs within the NPPF:

Paragraph 81

Planning Policies should

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;
- c) seek to address potential barriers to investment, such as inadequate infrastructure, service or housing, or a poor environment; and
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation) and to enable a rapid response to changes

Paragraph 83:

Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
- b) the development and diversification of agricultural and other land-based rural businesses;
- c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

Paragraph 120:

Planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability. Where the local planning authority considers there to be no reasonable prospect of an application coming forward for the use allocated in a plan:

- a) they should, as part of plan updates, reallocate the land for a more deliverable use that can help to address identified needs (or, if appropriate, deallocate a site which is undeveloped); and
- b) in the interim, prior to updating the plan, applications for alternative uses on the land should be supported, where the proposed use would contribute to meeting an unmet need for development in the area.

4.2 The NPPF is clear that planning policies should set criteria, or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period (Paragraph 81). Further there is a requirement to help support the rural economy (Paragraph 83).

4.3 However, it is also important to recognise that there is a need for local planning authorities to review land allocated within plans and review land availability, and where there is no reasonable prospect of an application coming forward for the use allocated in a plan, the local planning authority should reallocate the land for a more deliverable use that can help to address identified needs (Paragraph 120).

Relevant national Planning Practice Guidance (nPPG) paragraphs:

- 4.4 Planning Practice Guidance sets out in a section on Housing and Economic Needs Assessment that Strategic policy making authorities must have robust evidence in regard to the economic need as well as housing need. The section clearly sets out how this evidence is to be gathered and how it is to be utilised. Specific paragraphs within this section of Planning Practice Guidance are as follows:
- Paragraph 025 (ID: 2a-025-20190220) sets out that Strategic policy-making authorities will need to prepare robust evidence to understand existing business needs.
 - Paragraph 026 (ID: 2a-026-20190220) sets out how this evidence can be gathered with evidence of market demand, market failure, existing employment stock etc.
 - Paragraph 027 (ID: 2a-027-20190220) sets out how market signals can be used to forecast future need within the district whilst Paragraph 030 (ID: 2a-030-20190220) sets out how employment densities can be calculated.

5. Growth Sites Delivery Strategy Study

- 5.1 North Norfolk Economic Development have commissioned BE Group and WSP to undertake a study into the delivery of employment land in North Norfolk. Whilst this is primarily relating to facilitating the delivery of employment sites as a whole, the study does provide evidence to support Policy ECN 1 of the emerging Local Plan in line with the updated Planning Practice Guidance as set out in Section 4 of this report.
- 5.2 This report is still in draft stage but does establish the basis for plan production by assessing the market in regard to future employment demand derived through stakeholder consultation and assessment the socio economic profile of the District and supply derived through stakeholder consultation and analysis of the existing employment land. Further to this the study assessed each employment site in the District setting out the land available for development, constraints to development and looked at potential opportunities for expansion.
- 5.3 The study then sets out a range of forecasting scenarios based on the following:
- Past Land Take-up: How much employment land has been delivered in the past 10 years and projecting this forward across the plan period.
- Labour Demand Forecasting: Projects the likely jobs growth by utilising econometrics based on the East of England model and projects the likely jobs growth in different industry sectors over the plan period.
- Labour Supply Forecasting: Projects the likely jobs on the basis of residential growth in the district for the working age population and projects this forward across the plan period.

Policy-On Labour Demand Forecasting: Adjusts the ‘Labour Demand Forecasting’ scenario based on the Enterprise Zone status of Scottow and the North Walsham Urban Extension.

- 5.4 The report concludes that the quantum and location of employment land proposed in Policy ECN 1 is sufficient to meet demand across the District between 2016 and 2036 and provides an additional level of flexibility and choice above the quantum proposed through each of the scenarios.
- 5.5 This study has not been brought as part of this report as it is in draft form currently and is a piece of work being undertaken by the Economic Development Team.

6. Background Paper 3: Approach to Employment

- 6.1 Members will be aware that to support the Regulation 18 Local Plan a number of background papers were produced. One of which, Background Paper 3: Approach to Employment¹, set out in Section 4 of the report, a methodology for assessing the boundaries of existing employment areas to ensure that these are up to date. This piece of work is ongoing and whilst the Growth Sites Delivery Strategy Study re-assessed each employment site, this piece of work will just ensure the boundaries are accurately mapped for the purposes of the policies maps.
- 6.2 It is not expected that this will result in significant changes, but may affect the numbers slightly in Policy ECN1 where changes to the boundaries are proposed.

7. Conclusions for Policy ECN 1: Employment Land

- 7.1 **In response to the consultation comments set out in Section 3**, it is considered that the quantum of land proposed within each location is sufficient to meet the demands of the requirement for employment land across the District.
- 7.2 The policy is considered to be **In line with national policy and guidance**, specifically Paragraph 81 and the supporting planning practice guidance, in that the amount of employment land proposed for each location is based upon the latest, up-to-date evidence as set out in the 2020 Growth Sites Delivery Strategy study. This study assesses the current employment market through stakeholder consultation, property market assessment and analysis of the socio-economic profile of the District, analyses the current employment sites and sets out a range of scenarios (Land Take up, Labour Demand, Labour Supply and Policy On Labour Demand) for employment land requirement within the District over the plan period. The study sets out a clear recommendation in favour of the quantum of employment land proposed in Policy ECN 1.
- 7.3 The supporting text has been updated in light of the undertaking of the Growth Sites Delivery Strategy Study. The only proposed change to the policy wording is to update the amount of employment land available following the detailed assessment within the 2020 Growth Sites Delivery Strategy study, as explained in Section 5 of this report.

¹ <https://www.north-norfolk.gov.uk/media/5022/3-approach-to-employment.pdf>

- 7.4 It should be noted that although the overall quantum has reduced this is through an exercise of the consultants measuring the sites and utilising their consistent approach. The actual amount of employment sites has not changed.
- 7.5 It should also be noted, as mentioned in Section 6, that a boundary review might alter the numbers slightly, but the work is still currently ongoing.
- 8. Conclusions for Policy ECN 2: Employment Areas, Enterprise Zones and Former Airbases**
- 8.1 **In response to the consultation comments set out in Section 3**, the policy does not include reference to flood risk as this is set out within emerging Strategic Policy SD 10: Flood Risk and Surface Water Drainage.
- 8.2 This policy seeks to maintain and ensure sufficient supply of employment land and premises are available to meet local employment demands and provide flexibility and choice for business creation. The policy seeks to ensure that in the first instance any employment proposals should be directed towards designated Employment Areas or Employment/Mixed Use allocations made through the Local Plan.
- 8.3 The policy is considered to be **in line national policy and guidance**, specifically with paragraph 120 of the NPPF which, as previously mentioned, provides additional flexibility in terms of appropriate marketing periods should sites not be considered to have any reasonable prospect of coming forward. The proposed policy seeks to ensure that marketing periods will be agreed with the Council before any marketing is carried out. This is to ensure that there is flexibility on a case-by-case basis, but for the avoidance of doubt 'not usually less than 12 months' has been added to ensure consistency with other policies in the plan which refer to marketing periods.
- 8.4 A further change is made to clarify that proposals on former airbases are restricted to employment generating proposals, for the avoidance of doubt.
- 9. Conclusions for Policy ECN 3: Employment Development Outside of Employment Areas**
- 9.1 **In response to the consultation comments set out in Section 3**, the requirement for proposals at Bacton Gas Terminal to be subject to an Environmental Impact Assessment has been added.
- 9.2 The policy is considered to be **in line national policy and guidance**, specifically with paragraph 120 of the NPPF which, as previously mentioned, provides additional flexibility in terms of appropriate marketing periods should sites not be considered to have any reasonable prospect of coming forward. The proposed policy seeks to ensure that marketing periods will be agreed with the Council before any marketing is carried out. This is to ensure that there is flexibility on a case-by-case basis, but for the avoidance of doubt 'not usually less than 12 months' has been added to ensure consistency with other policies in the plan which refer to marketing periods.
- 9.3 A paragraph has been added to the supporting text to ensure that the policy is not confused with the policies for expansions of existing tourist accommodation and tourist attractions.

9.4 Further, the proposal seeks to support the rural economy in line with Paragraph 183.

9.5 The Growth Sites Delivery Strategy Study sets out that there will be an impact as a result of the Covid-19 pandemic and its short-medium term economic consequences. This policy offers more economic flexibility during this uncertain period.

10. Recommendation:

It is recommended that members endorse the revised Policies ECN1, ECN2 and ECN3 recommending to cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.

11. Legal Implications and Risks

9.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by up to date and proportionate evidence, the application of a consistent methodology and take account of public feedback and national policy and guidance.

9.2 The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

12. Financial Implications and Risks

10.1 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.

Appendices

Appendix 1 – Schedule of Representations with comments

Appendix 2 – Revised wording for Policies ECN 1, ECN 2 and ECN 3.

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 Egmere 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 Egmere 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	

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	

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	

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.

Public
Access

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.

Economy Policies

Policy ECN1 - Employment Land

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

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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	

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

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.

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

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

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.

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

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 to be justified and subject to an Environmental Impact Assessment.
Support	0	
General Comments	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.

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Employment Land

Employment Allocations

The purpose of this policy is to ensure that a sufficient quantity of land is reserved for employment generating developments across the District.

~~10.11 To facilitate the employment requirements of the District as a whole, the Council considers it is important to retain a supply of land which is reserved (designated) solely for employment uses. The currently adopted Core Strategy designates 204 hectares of employment land. A significant proportion of this is located on traditional industrial estates in the District's towns and larger villages and which is already developed. According to the North Norfolk Housing and Economic Land Availability Assessment (HELAA) Part 2 (2018), approximately 42.53 hectares of designated land remained undeveloped within the District. However, this is not evenly distributed across North Norfolk and in some locations the choice of sites is very limited. In some locations, existing and new businesses have found it difficult to acquire suitable land and buildings, with a resulting delay or loss of investment. Many smaller local businesses wish to retain local connections including workforce and are dependent on local opportunities being available when they wish to expand and the Council aims to facilitate this.~~

~~10.12 The NPPF requires that the suitability of designated employment land should be kept under review and sites should not be retained for employment uses if there is little prospect of development within a reasonable period of time. An assessment of each of the Employment Areas made through the Core Strategy has been undertaken in line with Paragraph 120 of the NPPF. To ensure flexibility within the market the Council is proposing to designate a total of 285.54 hectares of employment land inclusive of the 192.51 hectares which are already developed for employment purposes. This will increase the supply of undeveloped employment land in the District to 93.03 hectares and provide a reasonable supply in each area of the District.~~

~~10.11 To facilitate the employment requirements of the District as a whole, the Council considers it is important to retain a supply of land which is reserved (designated) solely for employment uses. The Council consider it is important to offer a range of employment opportunities across the District to accommodate the expansion of local businesses and to ensure that there are opportunities for companies to move into the area.~~

~~10.13 The North Norfolk District Council Growth Sites Delivery Strategy Stage 1 Report (2020) assesses employment land not superseded by this Local Plan and allocated employment sites made through this plan to ensure consistency with Paragraph 120 of the NPPF. Further, the study assesses the local employment market in regard to market demand and market failures and establishes a future employment need within the District over the plan period.~~

~~10.14 The study sets out a range of scenarios: 'Past Land Take-up' looking at past employment development within the District and taking this forward across the plan period; 'Labour Demand Forecasting' which looks at econometrics based on the East of England model and projects the likely jobs growth in different sectors forward across the plan period; 'Labour Supply Forecasting' looks at the residential growth in the District and the resulting implications of providing jobs over the plan period; and 'Policy On Demand Forecasting' which adjusts the Demand Forecasting model with specific policy interventions such as Scottow Enterprise Zone and the North Walsham Urban Extension. These scenarios give a range of employment land need from 2.9 hectares under the 'Labour Demand Forecasting' scenario to 40 hectares under the 'Past Land Take-up' scenario.~~

The conclusions of the study go on to set out that these scenarios underestimate what is happening on the ground and that a higher quantum of employment land would be required to ensure flexibility within the market and to ensure that any upturn in the market can be satisfied over the plan period. As such the Council is proposing to designate a total of ~~285.54~~ 265.25 hectares of employment land inclusive of the ~~192.51~~ 201.41 hectares which are already developed for employment purposes. This will increase the supply of undeveloped employment land in the District to ~~93.03~~ 63.84 hectares and provide a reasonable supply in each area of the District.

Policy ECN 1: Employment Land

For the period 2016-2036, a total of ~~285.54~~ 265.25 hectares of land will be designated/allocated and retained for employment generating developments.

Employment creating developments will be approved on the following sites subject to compliance with Policy ECN 2 'Employment Areas, Enterprise Zones & Former Airbases'. Proposals which do not comply with Policy ECN 2 will not be supported.

Location	Existing Employment Areas (Including Enterprise Zones) Already Developed (Ha)	Existing Employment Areas (Including Enterprise Zones) Undeveloped (ha)	New Proposed Allocations (ha)	Total Employment Land
Eastern Area Totals	78.87	15.46	17.11	111.44
Catfield	11.46	0.34		11.80
Hoveton	8.06	2.11		10.17
Ludham	0.27	0		0.27
Mundesley	0.41	0		0.41
North Walsham	38.48	5.71	15.11 (Policies DS 14, DS 15, DS 16)	59.3
Scottow	18.70	7.30		26
Stalham	1.49	0	2.00 (Policy DS21)	3.49
Central Area Totals	34.10	7.51	5.43	47.04
Corpusty (Saxthorpe)	1.16	0		1.16
Cromer	16.51	1.72		18.23
Holt	7.18	5.79	5.43 (Policy DS 12)	18.40
Sheringham	2.26	0		2.26
Melton Constable	6.86	0		6.86
Roughton	0.13	0		0.13
Western Area Total	88.44	18.33	0	106.77
Blakeney	0.18	0		0.18
Fakenham	44.82	9.23		54.05
Egmere	16.50	5.00		21.50

Wells-next-the-sea	2.31	0.23		2.54
Tattersett	24.63	3.87		28.50
Total Across District	201.41	41.30	22.54	265.25

Table 3 Available Employment Land 2016 – 2036

Employment Areas, Enterprise Zones & Former Airbases

The purpose of this policy is to ensure that employment land within the District is protected for employment uses and that proposals that come forward for Employment Areas are for acceptable uses.

10.14 Employment uses are traditionally defined as B class uses (B1, B2, and B8) including offices, manufacturing and storage and distribution. The diversification of the economy and the decline in traditional manufacturing means that employment opportunities now emanate from a wider range of uses. There are opportunities for employment generating, non-B class uses, to co-exist alongside the traditional B-class uses on designated employment sites. There is a balancing act here: the cumulative impact of non-B class uses can have an impact upon the functionality of more traditional B class uses.

10.15 The proposed policy allows for mixed use developments to reflect the level of flexibility set out within the NPPF. Mixed use developments may include elements of development that do not fall within the B1, B2 and B8 use classes such as hotels, pub restaurants, trade counters and potentially care/nursing homes, all of which create job opportunity. Proposals for Main Town Centre Uses (as defined in the glossary of the NPPF) will not be supported on designated employment land unless it is first demonstrated that no suitable Town Centre, or edge of centre, sites are available.

10.16 Within North Norfolk there are two Enterprise Zones: Scottow Enterprise Park and Egmere Business Zone. Scottow Enterprise Park is a 26 hectare ex-RAF site on the northern edge of the Greater Norwich urban zone. The site provides a unique offering for grow-on space, with a private high voltage renewable electricity network it promises to be a strategic business location across the East and the UK. Egmere Business Zone is a 7.4 hectare site situated to the south of port facilities at Wells-next-the-Sea, which has been established to support investment associated with the growing offshore renewable energy sector off the North Norfolk Coast. Egmere Business Zone is subject to a Local Development Order (LDO) which introduces simplified planning on the site and sets out the type of development that is dealt with under Permitted Development Rights.

10.17 The District contains four former defence establishments: Coltishall Airbase, Neatishead (part), Sculthorpe Airbase (part) and West Raynham, which include large areas of brownfield land. Sculthorpe, West Raynham and Coltishall provide significant levels of existing housing but lack the key services and facilities which would make them suitable locations for new housing development. Due to the more isolated location of these sites, any further significant residential development would lead to increased car journeys and would not be in conformity with the settlement hierarchy and approach to sustainable development advocated in this Plan. However, these locations represent an under-used resource within the District and the Council wishes to support their re-use for appropriate employment generating uses. The Policies Map defines the 'technical area' for each site, indicating where development will be focused. The non-technical areas (such as former airfields) are defined as Countryside. Sculthorpe Airbase, being best served by the highway network,

is considered to offer opportunities for employment uses which would, for environmental or operational reasons, would not be acceptable on designated Employment Areas within settlements.

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

Sites that are identified as Employment Areas, Enterprise Zones and Employment / Mixed Use Allocations, as identified on the Policies Maps¹, will be protected for employment use.

New employment development, including B1, B2 and B8 uses, will be permitted on designated Employment Areas where all of the following criteria are met:

1. in the case of Main Town Centre Uses(1), it is first demonstrated that no alternative sequentially preferable site is available, and in all cases;
2. the proposed use does not undermine the functionality of the wider employment area;
3. the scale and appearance of the development is compatible with the character of its surroundings,
4. there are no significant detrimental health impacts as demonstrated through a Health Impact Assessment;
5. there are no significant amenity impacts on occupiers of nearby dwellings or users of adjacent buildings by virtue of increased levels of noise, odour, emissions or dust and impacts on light;
6. the traffic generated does not have a severe adverse impact on local amenity, highway safety or the operation of the highway network;

Non employment generating proposals will only be permitted where there is no reasonable prospect of the site being developed for the designated purposes as demonstrated through evidence of it no longer being suitable, available and/or economically viable, including evidence of appropriate marketing(2) and future market demand.

Enterprise Zones

Employment generating proposals on designated Enterprise Zones, as identified on the Policies Maps, will be supported where these comply with the Local Development Order specific to the site where such an Order has been prepared.

Former Airbases

Development proposals **for employment generating uses** on the former air base sites will allow for the re-use of existing buildings or development of replacement buildings within the 'Airbase Technical Areas', as identified on the Policies Maps ², provided that there is no overall increase in gross floor space of the existing permanent buildings. All proposals should seek to protect the surrounding environment and ensure no degradation of the site itself.

¹ Current Core Strategy employment designations and employment allocations can be seen on the existing Core Strategy Proposals Maps: <https://www.north-norfolk.gov.uk/proposalsmap> for proposed updates please see Background Paper 3 'Approach to Employment'

² Can be seen on existing Core Strategy Proposals Maps: <https://www.north-norfolk.gov.uk/proposalsmap>

1. NPPF glossary definition: Main Town Centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

2. Appropriate marketing periods, **not usually less than 12 months**, to be agreed in writing, on a case by case basis, with the Local Planning Authority prior to the commencement of any marketing activities.

Employment Development Outside Employment Areas

The purpose of this policy is to provide opportunities for businesses situated outside of defined Employment Areas with the potential to expand and thrive and to recognise the importance of employment outside the designated Employment Areas to the wider economy by requiring such uses to be retained where possible.

10.18 The majority of new employment development will be guided towards the sites that are designated in this Plan as Employment Areas. These sites represent clusters of uses in the most sustainable locations. However, in a rural District such as North Norfolk, smaller areas of employment will exist across the District resulting from historic land uses. These businesses are important to the rural economy, providing local opportunities for rural communities to live and work in close proximity.

10.19 Any development proposals for a change of use from an employment use to a non-employment use will need to be justified. These employment sites are important for the rural economy and any proposal resulting in the loss of jobs will have to demonstrate that the site is no longer viable for employment uses and/or that the loss of the employment would not have a detrimental impact upon the local economy.

10.20 Proposals for the expansion of existing businesses, will generally be supported for businesses that are based on agriculture, forestry or other industries where there may be sustainability advantages to being located in close proximity to the market they serve. The demonstration of sustainability advantages should include evidence of reduced need to travel, re-use of previously developed land or existing buildings, and enhanced opportunities for rural communities to access employment in their locality. This should be presented in the form of a Sustainability Statement accompanying an application.

10.21 Proposals that relate to the expansion of tourist accommodation or tourist attractions are covered by policies elsewhere in the plan.

~~10.21~~ There may be some cases where an industry and/or business would be detrimental to local amenity if located in a designated Employment Area or nearby a built up area. The Council has designated employment land at Tattersett for these types of uses. This employment land should be investigated in the first instance for these types of uses.

~~10.22~~ In order to ensure that development in rural areas is sustainable, proposals will be expected to make best use of previously developed sites. Developments that relate to the replacement of rural buildings should comply with the North Norfolk Design Guide and show how the provisions of the Guide have been met.

~~10.23~~ Bacton Gas Terminal is one of the largest gas terminal complexes in the UK. The pipeline can import up to 23.5 billion cubic metres of gas per annum, enough to supply 15 million homes. It is a

major local employer and occupies a large site which has an impact on the surrounding area. Any future development on the site should normally be contained within the existing site boundaries in order to limit the impact on the surrounding countryside.

Policy ECN 3: Employment Development Outside of Employment Areas

New Employment ~~uses~~ Development outside of Employment Areas

New Employment development outside of designated Employment Areas and Employment / Mixed Use Allocations will only be permitted where it can be demonstrated that:

1. there is no suitable and available land on identified or allocated Employment Areas
2. there are specific reasons for the development not being located on an identified or allocated Employment Area, including, but not limited to:
 - a. the expansion of an existing business;
 - b. businesses that are based on agriculture, forestry or other industry where there are sustainability advantages to being located in close proximity to the market they serve;
 - c. industries and/or businesses which would be detrimental to local amenity if located in settlements, including on identified or allocated Employment Areas.
3. the development would not adversely affect the type and volume of traffic generated.

Bacton Gas Terminal

Development at Bacton Gas Terminal that is ancillary to the terminal use will be supported within the defined area as shown on the Policies Map³. **Proposals must be supported by an Environmental Impact Assessment.**

Existing Employment Uses ~~outside of Employment Areas~~

~~Employment uses in locations outside of Employment Areas and Employment/Mixed Use Allocations are considered important to the economy of the District.~~ Conversion and redevelopment of, or change of use from existing employment ~~sites and buildings generating uses~~ to non-employment uses will be considered on their merits taking account of:

1. whether the loss of land or buildings would adversely affect the economic growth and employment opportunities in the area that the site or building would likely serve;
2. whether it is demonstrated that the site is no longer suitable, available and/or economically viable, including evidence of appropriate marketing (1) and future market demand.

1. Appropriate marketing periods, **not usually less than 12 months**, to be agreed in writing, on a case by case basis with the Local Planning Authority prior to the commencement of any marketing activities.

³ Can be viewed on the existing Core Strategy Proposals Map: <https://www.north-norfolk.gov.uk/proposalsmap>

Local Plan Draft Policies ECN6: New Build Tourist Accommodation, Static Holiday Caravans & Holiday Lodges & Extensions to Existing sites; ECN7: Use of Land for Touring Caravan & Camping Sites; ECN 8: New-Build & Extensions to Tourist Attractions; and ECN 9: Retaining an Adequate Supply & Mix of Tourist Accommodation

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final versions of Policy ECN6: New Build Tourist Accommodation, Static Holiday Caravans & Holiday Lodges & Extensions to Existing Sites; Policy ECN7: Use of Land for Touring Caravan & Camping Sites; Policy ECN 8: New-Build & Extensions to Tourist Attractions; and Policy ECN 9: Retaining an Adequate Supply & Mix of Tourist Accommodation

Recommendations: **1. It is recommended that members endorse the revised Policies ECN6, ECN7, ECN8 and ECN9 recommending to cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email: James Mann, Senior Planning Officer, 01263 516404 james.mann@north-norfolk.gov.uk Iain Withington, Planning Policy Team Leader, 01263 516034 Iain.Withington@north-norfolk.gov.uk	

1. Introduction

1.1 The emerging North Norfolk Local Plan has been subject to public consultation at regulation 18 stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approach in relation to consideration of the consultation responses and the finalisation of the supporting evidence. At the end of the process a revised Draft Local Plan incorporating justified modifications will be produced for the authority in order to consult at Regulation 19 Draft Plan publication stage ahead of subsequent submission for examination. At such a stage the Plan will be subject to consideration by an independent inspector against a number of legal tests and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report will be produced, which will determine if the Draft Plan is sound, with or without

further modifications, following which the Plan can be formally adopted by the Council.

- 1.2 Tourism is vital to North Norfolk's economy; in 2017, 8,827,700 trips were made to North Norfolk (day and staying), accounting for a total tourism value of £505,109,250. Further, tourism accounts for 28.4% of all employment (Destination Research, n.d. p. 2)¹. The tourism economy of North Norfolk is heavily dependent on the quality of the natural environment; the District provides an extremely diverse tourism offer, primarily due to its varying landscape comprising an attractive coastline, much of which is within an Area of Outstanding Natural Beauty (AONB), extensive countryside, coastal birdlife, seaside resorts, historic towns and villages and the Norfolk Broads.
- 1.3 Supporting the District's tourist industry is therefore recognised as being of great importance, but it must not be at the expense of the assets and attractions that draw people into the area. It is recognised that within North Norfolk visitor pressures can give rise to concerns in environmentally sensitive locations such as the Norfolk Coast AONB, the coastal Natura 2000 sites, North Norfolk Heritage Coast and The Broads, and related strategies² and studies³ confirm that policy needs to recognise the more restricted capacity of these areas
- 1.4 **The purpose** of this report, is following a review of regulation 18 consultation feedback to seek Members endorsement of the final suite of policies that address tourism for future Plan making ahead of Regulation 19 consultation and then submission of the Plan.

2. Background and Update

- 2.1 The purpose of Policy ECN6 is to set out the locations that are acceptable for new tourist accommodation and the approach to extensions. The starting point is that new permanent residential development is not be appropriate within a CCMA. In line with the requirements of the NPPF and Policies SD11 and SD 12 of the Draft Local Plan. As such new tourist accommodation within the Coastal Change Management Area (CCMA) is not in principle acceptable, but there is some room to allow for adaptation with regards the existing static holiday Caravans & Holiday lodges if the landscape and the natural environment is not harmed. The policy seeks to encourage roll back from the CCMA, but it is also acknowledged that this might not always be out of the CCMA entirely. This ties in with wider policies and the Council's aspiration to relocate these sites away from the cliff-tops.
- 2.2 Policy ECN 7 sets the locations that are acceptable for Touring Caravan and Camping Sites within the District, whilst Policy ECN 8 sets out the approach towards new build tourist attractions and extensions to these.
- 2.3 The purpose of Policy ECN 9 is to protect the supply of tourist accommodation within the District, recognising the important role that this

¹ Economic Impact of Tourism North Norfolk – 2017.

² *The primary aim of the Sustainable Tourism in the Broads 2016 – 2020 is 'To develop, manage and promote the Broads as a high quality sustainable tourism destination, in keeping with its status as an internationally renowned environment' (The Tourism Company, 2016, p. 18).*

³ *The AONB Tourism Impact Analysis found that tourism in the AONB should be controlled and managed to mitigate negative impacts.*

plays towards the local economy and, in some cases, the additional services and facilities that are supplied as a result.

3. Feedback from Regulation 18 consultation

- 3.1 All of the Regulation 18 consultation feedback has been published in the Schedule of Responses, previously reported to Members. For information, the feedback for the three draft policies is contained within Appendix 1 to this report and summarised below. Overall, the number of responses to the policies was limited, however, the respondents did raise some key issues. The comments are summarised below for each draft policy:

Policy ECN 6

- 3.2 Individuals: Seven members of the public made comments through the consultation period. Three objections were raised regarding the degree to which the flexibility of the policy, with some arguing that it is too restrictive and others arguing that it is too permissive. Two comments were made in support of the policy, whilst other comments were general that development should not be at the expense of policies relating to the environment and design.
- 3.3 Parish and Town Councils: One response from Bacton Parish Council that cliff top caravans would have a detrimental impact upon the landscape.
- 3.4 Statutory Bodies and Organisations:

The Broads Authority raised the need to differentiate between residential caravans and holiday caravans.

The Environment Agency set out that if development were permitted in the CCMA adequate warning and evacuation measures should be in place.

The Norfolk Coast Partnership requested that the AONB be mentioned in the policy more.

Other comments focused on the need to differentiate between all hotels and new hotels and setting out that the policy is too restrictive and not flexible enough.

Policy ECN 7

- 3.5 Individuals: Two responses from the public during the Regulation 18 Consultation. One response sets out the need to allow for further tourist development that is not at the expense of environmental policies, whilst another response stated that the policies should be more permissive.
- 3.6 Parish and Town Councils: Bacton & Edingthorpe Parish Council stated that caravan development on cliff tops not supported due to impact on development.
- 3.7 Statutory Bodies and Organisations:

The Environment Agency set out that the exception test is also required for Flood Zone 2 as well as Flood Zone 3. Measures should be put in place to ensure that these do not become permanent.

Others commented that the policy should be more flexible.

Policy ECN 8:

3.8 Individuals: One response set out the need to allow for further tourist development whilst not at the expense of environmental policies

3.9 Parish and Town Councils: None

3.10 Statutory Bodies and Organisations:

Norfolk Coast Partnership support the policy.

Kelling Estate stated that there is no need to impose blanket restriction on development in the AONB, Heritage Coast or Undeveloped Coast. This is contrary to the NPPF.

Policy ECN 9

3.11 Individuals: One response stating that development should not be at the expense of environmental policies and should be subject to similar requirements as HOU 06.

3.12 Parish and Town Councils: None

Statutory Bodies and Organisations: Kelling Estate commented that parts 1 and 2 are separate clauses and should use an 'or' and that wording should be placed in the supporting text to encourage countryside development through large estate management.

Wells NP Group stated that development around Wells should be restricted based on survey data of residents.

4. National Policy

4.1 The revised National Planning Policy Framework (NPPF) was published in February 2019. This policy framework and guidance provide the overarching policy approach, which is summarised below.

4.2 Relevant NPPF paragraphs:

- 83: Policies should enable sustainable tourism and leisure developments which respect the character of the countryside.
- 84: Use of previously developed land and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

- 86: Main Town Centre uses should be located in town centres, then in edge of centre locations, and only if suitable sites are not available should out of town centre sites be considered.
- 167: Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a CCMA any area likely to be affected by physical changes to the coast, and:
 - a) be clear as to what development will be appropriate in such areas and in what circumstances; and
 - b) make provision for development and infrastructure that needs to be relocated away from CCMA's.
- 168: Development in a CCMA will be appropriate only where it is demonstrated that:
 - a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;
 - b) the character of the coast including designations is not compromised;
 - c) the development provides wider sustainability benefits; and
 - d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast
- 169: Local planning authorities should limit the planned lifetime of development in a CCMA through temporary permission and restoration conditions, where this is necessary to reduce a potentially unacceptable level of future risk to people and the development.
- 170: Protection of the landscape and provision of net gains for biodiversity.
- 172: Great weight given to conserving and enhancing landscape and scenic beauty in the AONB, which has the highest protection in relation to these issues.

5. Coastal Change Policies within the emerging Local Plan

- 5.1 Members will be aware that Policies SD 11 and SD 12 were discussed at the October meeting of the Planning Policy and Built Heritage Working Party. Policy SD 11 seeks to reduce the risk from coastal change by managing the types of development that would be supported and sets out that no new permanent residential development will be permitted in the Coastal Change Management Area. Policy SD12 interlinks with Policy SD11 in order to make provision for development and infrastructure that needs to be relocated from the Coastal Change Management Area (CCMA), which are set out in the Shoreline Management Plans (SMP's) and covers the areas likely to be affected by physical changes to the coast over the next 100 years.
- 5.2 Due consideration has been given to the conformity of the policies within SD 11 and SD 12 and wording has been amended to ensure there is consistency between the strategic policies in regard to coastal management and the tourism policies.

6. The Environment Bill

- 6.1 The Environment Bill contains a clear biodiversity gain objective of a 10% increase from the pre-development biodiversity value to the post-development

value. It must be noted that the specific biodiversity metric to support this has yet to be published and the Environment Bill has yet to achieve royal ascent with a Public Bill Committee schedules for 1 December 2020.

- 6.2 Further detail on biodiversity will be given when Environment policies are brought to this Working Party for consideration. In the interim the requirement is that 'measurable biodiversity net gains' need to be demonstrated on site and this has been included within Policies ECN 6, ECN 7 and ECN 8.

7. Conclusions for Policy ECN 6: Proposals for Tourist Accommodation, Static Holiday Caravans & Holiday Lodges & Extensions to existing sites

- 7.1 **Consultation responses**, as set out in Section 3 of this report, are not considered to raise fundamental objections to the policy. The policy seeks to ensure that development is, in principle, guided away from the Coastal Change Management Area and the Area of Outstanding Natural Beauty. However, the policy also allows for the flexibility of new development being located in these areas where the proposal is for a replacement and can demonstrate that there would be no adverse impacts upon the landscape and the AONB, residential amenity, safety of the local highway network and ensure that there are measurable biodiversity net gains. This, in general addresses most of the comments that were made through the Regulation 18 consultation.

- 7.2 The word 'holiday' has been added to references to static caravans to ensure differentiation between holiday caravans and residential caravans. The policy has also been split out to ensure there is a clear difference between a new build development and an extension to a business. For clarity the policy does not refer to 'new build' but to proposals for to ensure that this also captures conversions etc.

- 7.3 The policy is considered to be consistent with strategic policies SD 11 and SD 12 (as set out in Section 5 of this report) in that permanent dwellings in this area are not acceptable but other forms of development may be subject to the criteria set out within this policy and the submission of a Coastal Erosion Vulnerability Assessment to ensure adequate evacuation and warning measures are in place.

- 7.4 The policy, as worded, is considered to be **In line with national policy and guidance**. The NPPF requires planning policies to enable sustainable rural tourism which respects the character of the countryside and to enable the sustainable growth and expansion of all types of businesses in rural areas, through both the conversion of existing buildings and well-designed new buildings (para. 83). Wording has been tightened in this regard to ensure greater conformity with national policy.

- 7.5 In addition, the NPPF also requires Main Town Centre Uses (which includes hotels) to, in the first instance, be located in town centres (Para 86). It is recognised that the tourism economy of North Norfolk is heavily dependent on the quality of the natural environment and priority should therefore be given to support tourist accommodation whilst also minimising harm resulting from development.

7.6 The new draft policy therefore aims to direct new tourist accommodation, static caravans and holiday lodges within the boundaries of existing settlements, whilst also allowing for the expansion of existing businesses. The policy allows for new static caravan sites or holiday lodge accommodation where it would relocate existing sites on the clifftop or within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3. In addition, the supporting text of the Policy would require the imposition of conditions (where appropriate) to ensure that the development was retained as tourist accommodation.

8. Conclusions for Policy ECN 7: Use of Land for Touring Caravan and Camping Sites

8.1 **Consultation responses** have not led to any fundamental changes, but there has been a clarification in regard to the Environment Agency and the reference to Environment Agency Flood Risk. The wording has been revised to ensure that the relevant policies in the plan in regard to flood risk and coastal erosion are also adhered to with regard to proposals for touring caravans and camping sites. Again in light of the Environment Agency comments, and for consistency, a clause has been added to the policy to require the submission of a Coastal Erosion Vulnerability Assessment to ensure adequate evacuation and warning measures are in place.

8.2 The policy, as worded, is considered to be **In line with national policy and guidance**. The policy allows for sustainable rural tourism, which respects the character of the countryside, is an important part of a prosperous rural economy (para. 83), whilst respecting the significance of the Norfolk Coast AONB and The Broads National Park being valuable asset for North Norfolk in terms of sustainable tourism. Wording has been tightened in this regard to ensure greater conformity with national policy.

8.3 In addition, the supporting text of the Policy would require the imposition of conditions (where appropriate) to ensure that the development was retained as tourist accommodation and to outline the imposition of a seasonal occupancy condition when proposed accommodation is not suitable for year-round occupation by nature of its location, design or proximity to a habitat that needs extra protection at certain times of the year.

8.4 In conclusion the minor changes to the policy seek to ensure consistency with other policies within the plan rather than significant changes to the policy intention itself.

9. Conclusions for Policy ECN8: New Tourist Attractions and Extensions to Existing Tourist Attractions

9.1 **Consultation responses** were largely supportive with Kelling Estate setting out that this should not be a blanket restriction in the AONB, Heritage Coast and Undeveloped Coast. However, it is considered that given the level of environmental protection and the importance of these areas, particularly the AONB, it is the correct approach that the presumption is against tourist attractions and extensions to existing attractions in these locations.

9.2 The policy, as worded, is considered to be **In line with national policy and guidance**. National Guidance requires planning policies to recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. It requires development to be sensitive to its surroundings, not to have an unacceptable impact on local roads and to exploit opportunities to make a location more sustainable. The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist (para. 84).

9.2 It is recognised, however, that there may be instances where development in the Countryside policy area could be acceptable, providing that it has been demonstrated that there is no suitable buildings for re-use and subject to there not being any unacceptable impact on the landscape, highways, amenity and light etc.

10. Conclusion for Policy ECN 9: Retaining an Adequate Supply & Mix of Tourist Accommodation

10.1 **Consultation Responses** were limited but a change has been made in response to the consultation in that an 'or' has been added between criterion 1 and criterion 2.

10.2 The policy is considered to be **in line with National guidance**. Across North Norfolk, there is a broad range of tourist accommodation available including (but not limited to) caravan sites, camp sites and glamping sites, self-catering accommodation, hotels and guest houses for all year round and seasonal uses. The policy therefore aims to discourage the re-use of beneficial tourist accommodation (except when specific criteria are met) to ensure conformity with the NPPF in regard to the sustainable rural economy.

11. Recommendations

It is recommended that members endorse the revised Policies ECN6, ECN7, ECN8 and ECN9 recommending to cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager.

12. Legal Implications and Risks

12.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by up to date and proportionate evidence, the application of a consistent methodology and take account of public feedback and national policy and guidance.

12.2 The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

13. Financial Implications and Risks

- 13.1 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.

Appendices

Appendix 1 – Schedule of Representations with comments

Appendix 2 – Revised wording for Policies ECN 6, ECN7, ECN8 and ECN9

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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 (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
				<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
				<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
				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.	
ECN6	Concept Town Planning (1217445)	LP544	Object	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."	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	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.	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	

DRAFT

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 sustain 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 74				<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 76				<p>where: 1. the site lies within the settlement boundary of a selected settlement; or 2. the proposal is for the expansion of an existing business; or 3. the site lies outside of the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3;(94) 4. in all cases there is no significantly detrimental impacts on the area's landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network. Taking the above points in order, the Caravan and Motorhome Club has no comment in respect of point 1, as it is seeking changes in policy to take into account existing sites more proactively. In terms of point 2, the Caravan and Motorhome Club supports the inclusions which allows for existing businesses to expand to take into account additional growth. In terms of point 3, the Caravan and Motorhome Club largely supports the approach being taken here, however, sites should be considered on a site by site basis. Where landscaping and surrounding vegetation surround sites within the AONB, policy should allow their expansion. The impact of increased caravans on the surrounding landscape will be limited due to the surrounding vegetation. In terms of point 4, the Caravan and Motorhome Club largely supports the approach being adopted here. However, this approach should be replicated for sites within the AONB. If there is no significant impact upon the landscape, ecology and amenity, then development proposals which seek to improve the offer, and thus the local economy, should be supported.</p>	

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

Policy ECN8 - New Build & Extensions to Tourist Attractions

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

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

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

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

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

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

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	

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	

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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	

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	

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

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

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'

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	

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

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.

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	

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

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

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

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

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

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

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	

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.

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New-Build Tourism Accommodation, Static Holiday Caravans & Holiday Lodges

The purpose of this policy is to ensure that new-build tourist accommodation, static holiday caravans and holiday lodges are located in appropriate locations and to allow flexibility for existing businesses within the countryside the opportunity to expand where appropriate.

10.51 Across North Norfolk, there is a broad range of tourist accommodation available including self-catering cottages, guest houses and hotels as well as static holiday caravans and holiday lodges. Collectively, they create a diverse choice of places for tourists to stay. The provision of a diverse range of tourist accommodation is desirable: tourists visiting the area can have positive impact on the economy.

10.52 The preferred locations for new-build tourist accommodation, static holiday caravans and holiday lodges is within the boundaries boundary of a designated settlements. This is to enable visitors to access a range of services by a choice of travel modes (including on foot). Such development will not normally be permitted in the Countryside in order to protect the area from new-build accommodation, static holiday caravans and holiday lodges being built across the District. This would not prevent the expansion of existing businesses, or the re-use of existing buildings.

New Para: The presumption is that new proposals should not be located within the Coastal Change Management Plan. However, where new build tourist accommodation is proposed within a designated Coastal Change Management Area the application is expected to be supported by evidence to demonstrate adequate warning and evacuation arrangements. This is to be demonstrate through a Coastal Erosion Vulnerability Assessment.

10.53 Static caravan sites can have a significant impact on the landscape and this is particularly felt in the main resort areas of Cromer, Mundesley and Sheringham where a series of adjoining sites are prominent in an otherwise largely undeveloped coast. The Council has an aspiration to relocate these sites away from the cliff-tops, and therefore, as an exception to the general presumption against new static caravan sites, they may be permitted where they directly result in the removal of an existing cliff-top caravan site to a site with a lesser landscape impact or away from an area at risk of erosion or flooding. On occasion, it may be appropriate for an existing site within the North Norfolk Coast AONB to relocate to another site in the AONB that has less impact than the current site. In these cases the direct and indirect impact of the proposal must be carefully considered (the AONB Tourism Impact Analysis report found that tourism growth must be sufficiently controlled and managed to mitigate any negative impacts).

10.54 The replacement of static caravan sites with lodge-style developments will be permitted where it improves the appearance and landscaping of the site or relocates a prominent or at-risk static caravan site. However, within the cliff-top zone the priority is to relocate these existing sites rather than consolidate their use. As with all development, proposals for any accommodation will only be allowed after it has been demonstrated that no adverse impact on the integrity of Natura 2000 Sites will result.

10.55 Hotel accommodation is defined as a Main Town Centre use and will usually need to comply with Policy ECN 4 'Retail & Town Centres'. Hotel accommodation may be permitted within employment areas, in line with Policy ECN 2 'Employment Areas, Enterprise Zones & Former Airbases'. However, this will not permit ancillary development such as self-catering units.

New Para: The extension to existing tourist accommodation section relates purely to extensions to these specific types of tourist accommodation. Expansions to tourist attractions and expansions to employment generating uses are set out within other policies within the plan.

Policy ECN 6: ~~New-Build~~ Proposals for Tourist Accommodation, Static Holiday Caravans & Holiday Lodges & Extensions to existing sites

~~New-build~~ Proposals for tourist Accommodation

~~New-build~~ proposals for tourist accommodation, static holiday caravans and holiday lodges¹ will be supported where:

1. the site is within the settlement boundary of a selected settlement; or
- ~~2. the proposal is for the expansion of an existing business; or~~
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;²; and
4. the proposal demonstrates measurable biodiversity net-gains on site; and
5. The proposal would not have a significantly detrimental impact upon: the defined special qualities of the Area of Outstanding Natural Beauty; the key characteristics and valued features of the defined Landscape Type (as set out in the North Norfolk Landscape Character Assessment SPD); residential amenity; and the safety and operation of the local highway network.

~~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.~~

Where the development is for a hotel, this should demonstrate compliance with the sequential approach in accordance with national and local retail policies.

Extensions to existing tourist accommodation

Business expansion and extensions to existing tourist accommodation, static caravans and holiday lodges will be supported where:

1. the proposal demonstrates measurable biodiversity net-gains on site; and
2. The proposal would not have an adverse impact upon: the defined special qualities of the Area of Outstanding Natural Beauty; the key characteristics and valued features of the defined Landscape Type (as set out in the North Norfolk Landscape Character Assessment SPD); residential amenity; and the safety and operation of the local highway network.

All proposals within a designated Coastal Change Management Area shall demonstrate through a Coastal Erosion Vulnerability Assessment that the proposal will not result in an increased risk to life.

¹ Including buildings such as cabins and guest houses.

² Taking into account the equivalent risk from all sources of flooding

Use of Land for Touring Caravan & Camping Sites

The purpose of this policy is to ensure that the use of land for touring caravan and camping sites is located in appropriate locations.

10.56 Across North Norfolk, there is a wide variety of accommodation available to tourists including (but not limited to) touring caravan sites, camp sites and glamping sites for all year round and seasonal uses. These sites can provide a range of seasonal, temporary tourist accommodation, differing in size and location. Such accommodation types are valuable in adding to the diverse choice of places for tourists to stay.

10.57 The use of land for touring caravan and camp sites has a lower impact than new-build accommodation as they are not permanently occupied and in winter months there may be little evidence of activity. However in summer months they can be intrusive in the landscape and may add to visitor pressure on particular areas if not controlled. As far as seasonal or temporary tourist accommodation is concerned, therefore, the policy approach taken will very much reflect the degree of protection of the area of land on which the proposal is being made, landscape character and visual impact, as well as the effects on infrastructure and communities are key considerations.

Proposals which do not require permanent structures to remain on site are likely to be considered to be more acceptable.

New Para: Proposals must have regard to national guidance and relevant policies within this Local Plan in relation to the sequential approach to flood risk

New Para: Where proposals for touring caravans and camping sites are proposed within a designated Coastal Change Management Area the application is expected to be supported by evidence to demonstrate adequate warning and evacuation arrangements. This is to be demonstrate through a Coastal Erosion Vulnerability Assessment.

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

The use of land³ for touring caravan and camping sites⁴ 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. 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 Zone⁵; and
4. the proposal does not result in an increased risk of flooding

³ The making of any material change to the use of land or the use of buildings (adapted from Section 55 of the Town and Country Planning Act, 1990)

⁴ Including (but not limited to) sites used for touring caravan and camping sites, glamping, yurts, tepees and shepherd's huts.

⁵ Taking into account the equivalent risk from all scores of flooding.

All proposals within a designated Coastal Change Management Area shall demonstrate through a Coastal Erosion Vulnerability Assessment that the proposal will not result in an increased risk to life

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.

In all cases proposals must demonstrate measurable biodiversity net-gains on site; and that the proposal would not have a significantly detrimental impact upon: The key characteristics and valued features of the defined Landscape Type (as set out in the North Norfolk Landscape Character Assessment SPD); residential amenity; and the safety and operation of the local highway network.

New-Build & Extensions to Tourist Attractions

The purpose of this policy is to ensure that tourist attractions that broaden the tourism opportunities across the District and extend the tourist season are encouraged in appropriate locations.

10.58 It is recognised that tourism development differs from other forms of economic development in that it is sometimes preferable for attractions to be located outside of settlement boundaries.

Therefore, whilst being within the boundaries of designated settlements is the preferred location for new build tourist attractions, attractions that broaden the tourist opportunities across the District and extend the tourist season will be welcomed in some instances.

10.59 Those tourist attractions defined as Main Town Centre uses (includes theatres, museums, galleries and concert halls and conference facilities) will need to comply with Policy ECN 4 'Retail & Town Centres'.

10.60 In the case of proposals in designated Countryside which do not involve the re-use of existing buildings, additional evidence will be required to demonstrate that there are no suitable existing buildings for re-use within the vicinity locality. This will be determined upon the basis of the type of application being made and pre-application advice should be sought to agree the scope of the sequential approach with the Local Planning Authority.

10.61 As with the use of land for accommodation, the policy approach taken will very much reflect the degree of protection of the area of land on which the proposal is being made, with landscape character and visual impact, as well as the effects on infrastructure and communities being key considerations.

New Para: The extension to existing tourist attractions section relates purely to extensions to these specific types of tourist attractions. Expansions to tourist accommodation and expansions to employment generating uses are set out within other policies within the plan.

Policy ECN 8: New-Build & Extensions to Tourist Attractions-Tourist Attractions and Extensions to Existing Tourist Attractions

The Council will support proposals for new ~~build~~ tourist attractions⁶ and **extensions to existing attractions** across the District. Proposals will be supported where:

- ~~1. the site lies within the settlement boundary of a selected settlement; or~~
- ~~2. the proposal comprises an extension to an existing attraction;~~
3. the site does not lie within the AONB, Heritage Coast, or Undeveloped Coast⁷;
4. it has been demonstrated that there are no suitable buildings for re-use in the locality;

In all cases, **proposals must demonstrate measurable biodiversity net-gains on site; and that the proposal would not have a significantly detrimental impact upon: The key characteristics and valued features of the defined Landscape Type (as set out in the North Norfolk Landscape Character Assessment SPD); residential amenity; and the safety and operation of the local highway network.**

Retaining an Adequate Supply and Mix of Tourist Accommodation

The purpose of this policy is to retain a mix of all types of tourist accommodation.

10.62 The existing stock of hotels, guest houses, bed and breakfasts and self-catering accommodation can provide an important role in support of the District's economy. However, this diverse range of accommodation can sometimes come under pressure for conversion, often to residential properties, particularly in locations where new residential properties are more strictly controlled.

10.63 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.

10.64 The policy therefore sets out an approach to protecting existing tourist accommodation from conversion to residential use where it may still be required for tourism. The policy resists the change of use, apart from in exceptional cases where it is clearly and satisfactorily demonstrated that there is sufficient local supply of accommodation.

10.65 The purpose of the policy is to retain a mix of all types of tourist accommodation. The requirement for a viability test prevents premature closure of facilities where demand still exists. However, it would allow for redevelopment if the use is no longer viable. A threshold has been applied for caravan /**camping** sites to reflect the Caravan Club and Caravan and Camping Club allowance for up to **5 five (5)** units on certificated location sites.

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

Development proposals that would result in the loss of sites or premises currently, or last used, for tourist accommodation⁸ will be supported subject to:

1. alternative provision of equivalent or better quality and scale is available in the area or will be provided and made available prior to commencement of redevelopment; **or**

⁶ For recreational, cultural and leisure uses.

⁷ unless it can be demonstrated that the location is integral to the development

⁸ All hotels and other serviced establishments, all self-catering units, and touring/static **holiday** caravans/camping sites which provide more than 5 units.

2. the facility does not provide an important local facility or service⁹ to the community; and in all cases;
3. it can be demonstrated that there is no reasonable prospect of retention at its current site.

An independent viability test must demonstrate~~ed~~ that the use is no longer viable and that all reasonable efforts have been made to sell or let the property at a realistic price for a period of at least 12 months

⁹ ~~Public house / bar, restaurant or leisure facility where this is within the Countryside or is the last of its kind within a Large or Small Growth Town or a Large or Small Growth Village. As defined within Policy SD 6.~~

LUDHAM AND STALHAM STAITHE CONSERVATION AREA APPRAISALS AND MANAGEMENT PLANS 2020

Summary: This report seeks approval for the Ludham and Stalham Staithe Conservation Area Appraisals and Management Plans in line with national policy and best practice.

Recommendations: That the appraisals as set out within the body of this report be considered and taken forward for adoption by Cabinet.

Cabinet Members(s)	Wards(s) Affected
All Members	All Wards
Contact Officer(s) telephone number and emails: Kate Knights (Historic Environment Manager The Broads Authority), 07818 053806; kate.knights@broads-authority.gov.uk Chris Young, 01263 516138, Chris.Young@north-norfolk.gov.uk	

1. Introduction

1.1 As well as its picturesque coastline, rural landscape and big skies, the District is known for its rich historic environment. The District's heritage is an intrinsic part of its character and stands as testament to how the area has been shaped and evolved over time. This heritage manifests itself in many different forms and this is reflected in the quantity and variety of designations found across North Norfolk including:

- 82 conservation areas (4 of which are shared with the Broads Authority)
- Over 2,200 listed buildings
- 34 Parks and Gardens, 18 of which are Registered
- 86 Scheduled Monuments
- Over 250 Local Listings

1.2 Part of the District is also within the Broads, and this area is managed by the Broads Authority which is a Special Statutory Authority. Its statutory purposes are:

- To conserve and enhance the natural beauty, wildlife and cultural heritage of the Broads;
- To promote opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and
- To protect the interests of navigation.

1.3 These duties are similar to those of Britain's National Park Authorities with the addition of the duty concerning navigation and confer the same level of protection from inappropriate development as the National Parks.

1.4 The Broads Authority is the Local Planning Authority (LPA) for the land within its Executive area. It is responsible for the designation of Conservation Areas in the Broads area, however all of the parishes in the Broads are split and fall partly within their area and partly within the constituent District so it is important to take a

combined view of the shared heritage. There are 18 parishes split between the Broads and North Norfolk and four Conservation Areas.

- 1.5 As part of North Norfolk District Council's ongoing management of their 82 Conservation Areas, it was agreed that the Broads Authority should lead on the production of the Conservation Area Appraisals in the conservation areas that are shared between the two authorities, with input from NNDC. This is normal practice where the majority of the area falls within the Broads Authority Executive area. The first two conservation area appraisals to be worked on have been:

- Stalham Staithe (designated 1991)
- Ludham (designated 1974)

Neither appraisal has been reviewed since designation and neither has ever benefitted from an appraisal.

Both areas were in need of robust definition and understanding to ensure that the Conservation Area status remains meaningful and justified in line with current guidance and legislation. It was considered that the additional information and guidance provided by an adopted appraisal would help to inform and assist future decision making.

- 1.6 The Conservation Area Appraisals at Stalham Staithe and Ludham have now been approved and adopted by the Broads Authority.

2. Statutory Background

- 2.1 Conservation Areas are designated under the provisions of Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990. A Conservation Area is defined as an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.
- 2.2 Section 71 of the same Act requires local planning authorities to publish proposals for the preservation and enhancement of these conservation areas. Section 72 also specifies that, in making a decision on an application for development within a conservation area, special attention must be given to the desirability of preserving or enhancing the character or appearance of that area.
- 2.3 The appraisal documents now being considered conform to current Historic England guidance (Conservation Area Designation, Appraisal and Management 2016). Additional government guidance regarding the management of historic buildings and conservation areas is set out within the National Planning Policy Framework (2012 and subsequently updated). NNDC's adopted Local Development Framework (LDF) and the Broads Authority's Local Plan provide the local planning policy context.

3. What is a Conservation Area?

- 3.1. To assist in the preservation and enhancement of conservation areas and their settings, all Local Planning Authorities are required to review their Conservation Areas from 'time to time'. The preparation of Conservation Area Appraisals and Management Proposals is a key element in this process. They play a key-role in

NNDC's efforts to safeguard the environment, which is one of the stated priorities in its Corporate Plan: 2015-2019.

3.2 A Conservation Area Appraisal and Management Plan has two key objectives:

- 1: Firstly it defines the special characteristics or historic interest of the Conservation Area and identifies the issues that threaten these special qualities.
- 2: Secondly, it offers guidelines to prevent erosion of character and achieve enhancement.

3.3 In practice the benefits of reviewing a conservation often extend much further:

- 1: A fully adopted Appraisal and set of Management proposals provide additional support and guidance for decision-making through the Development Management process, since they become, on adoption, a material consideration for the Local Planning Authority when dealing with applications for development.
- 2: Having an up-to-date conservation area boundary which reacts to and reflects the position on the ground is easier to defend and becomes a more meaningful and justified designation.
- 3: Experience has shown that the preparation of Conservation Area Appraisals and Management Plans can offer a real and practical opportunity for local communities to engage in the future management of their local environment and as such the process contributes positively to community empowerment.

4. Assessment and Methodology

- 4.1 Officers at the Broads Authority have produced the Conservation Area Appraisals. Research has been carried out, along with site assessment, survey analysis and collation of key sources. This has been carried out in liaison with officers from NNDC.
- 4.2 The documents set out the planning policy context, special interest including location and setting; historic development and archaeology; layout and plan form; architectural and townscape qualities; character analysis including the qualities of buildings and the contribution of green spaces and suggested boundary changes. They also provide an overview of areas that could be enhanced and proposals for these enhancements.

It should be noted that no character appraisal can ever be completely comprehensive and the omission of any particular building, feature or space should not be taken to imply that it is of no interest.

5. Consultation and Formal Adoption

Stalham Staithe

- 5.1 Residents of Stalham Staithe and other interested parties were consulted on the Stalham Staithe Conservation Area Appraisal and Management Plan between February and April 2016. Residents in the conservation area were sent a letter and

leaflet with the draft document being available to view online. There was also a public event held at Stalham Town Hall on the 5th March 2016 and a meeting held on the 14th June 2016 with representatives from NNDC, the BA, Stalham Town Council and the County Council. Representations were taken into consideration and the final document was adopted by the Broads Authority in March 2017. Please find the results of the consultation attached as **Appendix 1**.

- 5.2 No extensions were made to the boundary as designated in 1991. In order to ensure that the whole of the conservation area is adopted by the appropriate authority, it is recommended that the Stalham Staithe Conservation Area Appraisal be brought forward for adoption by NNDC so that the small area within the North Norfolk District Council area benefits from the same level of protection as the rest of the conservation area.

Ludham

- 5.3 Residents of Ludham and other interested parties were consulted on the Ludham Conservation area and Management Plan between the 12th March and 15th May 2020. Residents were sent a letter and leaflet, with the draft document available to view online, and the original intention had been to hold a public event in the village. Unfortunately this was cancelled due to the government guidance relating to the Coronavirus pandemic. However, signs were displayed in the village and adverts placed twice in the village newsletter explaining that officers were available to discuss the proposals by telephone, email or post. Representations were taken into consideration. Please find the results of the consultation attached as **Appendix 2**.
- 5.4 Changes are proposed to the boundary, with the changes in the NNDC area being:
- Extension along School Road and Catfield Road to include the 19th century school, school grounds and the former District Nurses' House, which are important to the social development and history of the village.
 - Exclude Latchmoor Park, which is a mid-late 20th century housing development of insufficient historic interest for the conservation area.
 - Extension at the southern end of Horsefen Road to include Woodlands Cottage, to the east of the road.
 - Exclude the fields to the south and north of Lover's Lane and south of Norwich Road, as this farmland is not of particular historic interest and current guidance states that farmland should generally be excluded from conservation areas.
- 5.5 The Ludham Conservation Area Appraisal and Management Plan was presented to the Broads Authority's Heritage Asset Review Group (HARG) in June 2020 who were supportive of it and it was adopted by the Broads Authority's Planning Committee in August 2020. In order to ensure that the whole of the conservation area is properly adopted and to avoid confusion for residents' as to their planning status, it is recommended that the Ludham Conservation Area Appraisal and Management Plan be recommended for adoption at NNDC's Cabinet. As the conservation area boundary will have changed, legislation then requires that the designated area is advertised in the Local Press and London Gazette and it is proposed that this will be carried out jointly by NNDC and the BA.

6. Budgetary Implications

- 6.1 There is a cost associated with the statutory advertisement and it is proposed that this be shared between the District Council and the Broads Authority.

Recommendations

- 1. That the appraisals as set out within the body of this report be considered.**
- 2. That the appraisals as set out within this report should be taken to Cabinet with a recommendation for approval.**

Appendix 1: Results of Stalham Staithe Conservation Area Appraisal consultation

Appendix 2: Results of Ludham Conservation Area Appraisal consultation

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Stalham Staithe Conservation Area Appraisal

Consultation responses.

The appraisal was prepared in consultation with North Norfolk District Council as part of the conservation area is within their boundary.

A public consultation morning was held between 1.00 pm and 3.00 pm on Saturday 5th March 2016 at Stalham Town Hall. This was attended by officers from the Broads Authority Planning Team and by approximately 50 members of the public to ask questions, propose or suggest minor amendments to the appraisal or boundary, and raise issues of concern.

From	Comment	BA response
Staithe Road resident	'Riverside' Cottages should be 'Riversdale' Cottages	Text will be amended
Resident	Query re areas for consideration	Clarified by BH no further action proposed.
Residents, Burtons Mill	Supports additional landscaping to communal area at rear of Burtons Mill & asks for details	BH clarified that no scheme or funding is currently agreed, but this is one of several suggested improvements to the Conservation Area. No further action proposed.
# Resident, The Staithe	<ul style="list-style-type: none"> • Removal of 'rubbish hut' • Ownership of car park area • Bridge and tree on Staithe • Condition of edge of Staithe • Surfacing to picnic area • Tree at Staithe Corner, Mill Road • Allotments are well used – waiting list • Area of consideration on Mill Road beside the A149 	<ul style="list-style-type: none"> • Public realm areas to be reported to HARG and is being discussed by the Stalham Staithe Forum (See note below) • Noted – existing boundary to remain • Existing boundary to remain
Residents, Burtons Mill	<ul style="list-style-type: none"> • Bonfires causing nuisance • Car parking around The Staithe & The Museum of the Broads 	<ul style="list-style-type: none"> • BH replied to clarify that bonfires not covered by Planning Legislation & sent link to NNDC Environmental Health • Parking issues have been raised by others – to be reported tot HARG & discussed by the Stalham Staithe Forum
Resident, Mill Road	Feeding of ducks & vermin	BH responded - to be reported to HARG & discussed by the Stalham Staithe Forum
Aylsham resident	<ul style="list-style-type: none"> • Appraisal an 'excellent document' • Correction to text • Pleased to see sustainable tourism as a priority • Mooring and piling • BESL & flood banks 	<ul style="list-style-type: none"> • Noted • Text will be amended • Noted • To be discussed by the Stalham Staithe Forum • To be discussed by the Stalham Staithe Forum

<p>Resident, Stalham Staithe</p>	<ul style="list-style-type: none"> • Preserving the character of the Conservation Area through protection of buildings • Query re areas for consideration • Concerns re possibility of consultation removing Conservation Area status • Concern over possible re-development plans • What has prompted review at this time? • Use of redundant boatyard structures • Concern over purpose of document and 'modern architecture' in the Conservation Area • Concern that holiday trade at a maximum – replacement buildings should be on a like-for-like basis • Supports additional planting around the Bakers site • Requested details of planting behind Burtons Mill • Requested details of improvements in front of The Mermaid's Slipper/parking area, refuse area and picnic area 	<ul style="list-style-type: none"> • Noted • Areas for consideration to promote discussion about those areas • Boundary will remain unless strong representations either way • BA not aware of any large scale re-development plans, but do receive individual enquiries largely about domestic scale development • Part of wider review of Conservation Areas in the Broads • Important to retain historic boatyard use • Appraisal aimed at providing guidance for future development in the Conservation Area. High quality modern architecture can be appropriate in some circumstances • Concern noted. Appraisal aimed at providing guidance for development and not as a blanket tool to prevent development • Noted • No specific proposals – suggested improvements to the character of the Conservation Area. • No specific proposals – suggested improvements to the character of the Conservation Area. Public realm area to be reported to HARG discussed by the Stalham Staithe Forum
<p># Resident, Mill Road</p>	<ul style="list-style-type: none"> • Concern over public involvement re development proposals, especially Utopia & the Broadside campsite • Traffic volumes in summer months • Planning approval on Utopia/Arcadia site for two dwellings • Contribution of recent industrial unit to character of Conservation Area • Request for guidance on PD rights & changes • Locally listed buildings • Suggested text amendment re mill on Mill Road 	<ul style="list-style-type: none"> • Noted • Report to HARG & discussed by the Stalham Staithe Forum • Noted – amend text • Noted, amend text to include 'historic' • Information included in CAA consultation & following designation - consider guidance leaflet on appropriate changes to their properties • Discuss potential additions to Local List at the Stalham Staithe Forum • Text amended

	<ul style="list-style-type: none"> • Suggested text amendment re Broadsedge campsite • Ownership of area in front of The Mermaid's Slipper • Removal of refuse/recycling area • Landscape improvements to Baker's site • Parking in front of dwellings • Hedge on Mill Road • Improvements to picnic area • Condition of Staithe's river bank & Mill Road, parking and overnight camping, repair of banks, drainage ditches & verges to address flooding issues & erosion. Ban HGV vehicles. • Retain existing Conservation Area boundary and extend to south of Mill Road • Inform residents re BA follow-up of Planning conditions 	<ul style="list-style-type: none"> • Campsite outside boundary, text is reference to 'setting' of Conservation Area • Discuss at the Stalham Staithe Forum • Discuss at the Stalham Staithe Forum • Noted • Noted • Noted – suggested future enhancements for consideration • Noted • Noted. To be reported to HARG & discussed at the Stalham Staithe Forum • To be discussed at HARG • To be discussed at HARG
Resident, Mill Road	<ul style="list-style-type: none"> • Planning issues – Utopia & Arcadia,. new houses on Staithe Road, campsite • Highways issues associated with planning approvals on 'inadequate road network'. • More collaboration between the Broads Authority, the Town Council & local residents • Retain existing Conservation Area boundary, omitting sub-station • Consider extending Conservation Area boundary to include land to south of Mill House and part of the Broads Edge Marina up to the river bank • Planning policies to be applied in a consistent manner • Inform residents of permitted development rights • Ban all parking on the river bank and next to picnic area • Repair quay heading on the Staithe • Repair eroded banks/verges along river's edge and Mill Road, but preserve rural character • Implement plan to improve drainage along Mill 	<ul style="list-style-type: none"> • All to be reported to HARG & discussed at the Stalham Staithe Forum

	<p>Road</p> <ul style="list-style-type: none"> • Restrict parking for visitors to the Museum to Richardson's boatyard • Take action against residents who store scrap waste in gardens, visible from road • Retain refuse/recycling point 	<ul style="list-style-type: none"> • All to be reported to HARG & discussed at the Stalham Staithe Forum
Resident	Maintenance of fences, trees and hedges on Richardson's Boatyard	Outside the conservation area – liaise with Richardsons through Stalham Staithe Forum
Resident	<ul style="list-style-type: none"> • Maintenance of trees and hedges on Richardson's Boatyard • Parking around the Staithe & the Museum 	<ul style="list-style-type: none"> • Outside the conservation area – liaise with Richardsons through Stalham Staithe Forum • To be reported to HARG & discussed at Stalham Staithe Forum
Resident	<ul style="list-style-type: none"> • Retain the refuse/recycling • Repair the quay heading at The Staithe 	<ul style="list-style-type: none"> • Liaise with NNDC & Town Council • To be reported to HARG & discussed at Stalham Staithe Forum

- Attended the consultation session

Note: Following the consultation process a working group has been formed, The Stalham Staithe Forum, comprising of representatives from the Local Authorities, residents and local businesses with an interest in the area in order to try and resolve issues, not just within the Conservation Area or the remit of the Broads Authority as Local Planning Authority.

From the statutory/amenity bodies consulted, responses were received as follows:

Organisation	Comment	BA response
North Norfolk District Council	•	•
Historic England	•	•
Broads Society		

Main issues arising from the consultation:

- *Parking – Museum & over-night*
- *Refuse/recycling area*
- *Repairs to river bank/quay heading*
- *Maintenance of Mill Road verges etc*
- *Communication between residents & Broads Authority re planning*

Ludham Conservation Area re-appraisal

Consultation results

The re-appraisal was prepared in consultation with North Norfolk District Council as part of the conservation area is within their boundary.

A public exhibition was due to be held on Saturday 21 March 2020, at the St Catherine's Church Rooms, Ludham. Unfortunately the public exhibition was cancelled due to the government restrictions imposed surrounding Covid 19. However, a leaflet was delivered to all residents and businesses within the conservation area boundary and within the proposed amended areas, site notices were erected, an advertisement placed in the Parish Newsletter, and copies of the appraisal documents were made available both online and in hard copy format which could be sent out from the Broads Authority office. The leaflet included a comments section and consultees were also able to comment online and via email. The consultation ran from Thursday 12th March and was extended from Friday 17th April to Friday 15th May 2020 to give more time for response following the Covid-19 Lockdown. We received 20 responses to the consultation as highlighted in the table below:

From	Comment	BA Response
Resident	Didn't understand what is being proposed. Also line of the conservation area appears to go through her property.	Now understands proposed changes. Boundary amended and now outside CA. No further comments. Document amended
Resident	Would like to know what extension means for development in part of garden that was previously excluded	Responded advising of changes that would apply – no further comments submitted No changes made to document
Business Owner	Would have effect on Womack Staithe. Supportive of CA document and level of information on Womack Staithe, would like to encourage more people to the area as many people do not know about the staithe - sign at the top of the road would help, made suggestions on positioning of planting to ensure they do not obscure views to shop and pump out facilities. Carpark privately owned.	Re-appraisal text amended accordingly regarding appropriately positioned planting and directional sign Document amended and will speak to colleagues about signage.
Resident	Supportive of inclusions but not of exclusions, in particular small areas around Horsefen Road. Can't see BA being able to make improvements and highlighted an area at Ludham Manor which 'now looks like a scrap yard', supportive of zebra crossing but	Wrote back to resident explaining why areas are proposed to be removed, that the scrap yard in Manor House grounds - understand this is building site at present for approved scheme and once the

	does not like all other improvements proposed.	works are complete it is expected that the site will be tidied, that there is no plan for zebra crossing at present but enhancement works in proposed village centre should slow traffic which would make crossing the road more easy. No changes made to document
Resident	Would have effect on The District Nurses House, School Road. Does not intend to extend or change the house so inclusion in the CA is considered to be pointless. North Norfolk can be trusted to look after the school as they have done previously. Does not want the District Nurses House to be in the CA boundary. Considers boundary should be left where it is.	Concerns noted however the District Nurse House is still considered to be worthy of inclusion in the CA area due to both its cultural and historic significance. Further justification for its inclusion included within re-appraisal. Whilst it is acknowledged that no changes are proposed currently, future owners may wish to alter the house. Document amended.
Resident	Would have effect on St Benet's Cottage, Cold Harbour Lane. Objects. Why are we revising the CA? Why are we including St Benet's Cottage? What implications will it have? Why are we removing the field adjacent to St Benet's Cottage? Suspicious of our motives and considers it to interfere with his family life at the property.	Responded with email answering each question. It is considered that the property is worth of inclusion given its age and local vernacular and therefore proposed to be retained in inclusion. No changes made to document.
Resident	Complaint re: NNDC Planning Dept and proposal for site on Lover's Lane. Commends the Conservation Area re-appraisal and the BA's professional planners Stresses the importance of aesthetics in the village centre but not at the expense of H&S - dangerous junction from Staithe Road to main road and car parking should be restricted in village centre and at top of Staithe Road as it restricts access for emergency vehicles at present.	Noted Noted Re-appraisal text amended to help address car domination issues and parking rationalisation. Document amended.
Resident	Objection to planning application (NNDC) at the White House, Staithe Road and query as to how it can be considered to be acceptable within the conservation area.	Noted and asked NNDC to be consulted on the application.

		No changes made to document.
Resident	Objection to planning application (NNDC) at the White House, Staithe Road and query as to how it can be considered to be acceptable within the conservation area.	Noted and asked NNDC to be consulted on the application. No changes made to document.
Resident	Why is the appraisal being carried out? Why are fields being removed and will it make them more likely to be developed?	Responded explaining why the CAA is being carried out and why the fields don't meet the criteria and how it doesn't make them more likely to be developed. No changes made to document.
Resident	<p>Would like to see hard copies of documents. Would like to lobby strongly for an extension to the consultation deadline as there has been no public meeting and loss in time whilst everyone gets use to working from home etc. due to Covid-19</p> <p>CA appraisal 'really very good' and appreciates amount of work involved in its preparation.</p> <p>LPA has been derelict in regards of not providing a CAA in the 46 years since designation of the CA. Good that is happening now.</p> <p>Unfortunate that restrictions re: Covid-19 meant cancellation of public consultation event. Appreciates that the consultation period has been extended but feels that a public event should be held as soon as is possible and the consultation period extended further to suit.</p> <p>Extension on School Road to include School and Nurses House 'entirely appropriate'. Reflect important welfare changes in wider community and village</p> <p>Significance of C19th workshop adjacent to 12 School Road - Blacksmith's shop. Suggests site -specific brief</p>	<p>Documents sent and consultation extended in response to government restrictions surrounding Covid-19.</p> <p>Noted</p> <p>Noted</p> <p>It is deeply regretted that the public consultation event could not take place however it is not clear when this can go ahead safely and as the amount of consultation has been undertaken in accordance with regulations then advise we continue without.</p> <p>Re-appraisal text amended accordingly</p> <p>Re-appraisal text amended accordingly. A site specific brief is not considered appropriate here given there are other sites of equal significance in the village and a comprehensive approach would be better. Noted also that planning permission has been</p>

	<p>Could we consider extension along Catfield Road and Broad House on Malthouse Lane? Semi-detached workers cottages are characteristic of well-mannered, modest dwellings in rural Norfolk.</p> <p>Agree Latchmoor Park should be removed.</p> <p>Believes triangular island is remnant of old street pattern and should therefore be retained in CA. Also that the two houses on the island are good quality design that make reference to vernacular. Retention of existing CA controls desirable here.</p> <p>Agrees rationalisation of boundary to east of Horsefen Road needed, but wonders if all yard area and large barn should be included so CA boundary follows settlement boundary.</p> <p>Agrees with assessment of Woodlands and proposal to include it and that two other buildings here have been altered too significantly.</p> <p>Can imagine it is necessary to rationalise CA boundary next to Hunter's Dyke and Womack Dyke as proposed.</p> <p>Agrees not appropriate to include farmland in CA</p> <p>Agrees the CA should include St Benet's Cottage. Suggests a 'plot' of the field between Hall Common Cottage and Hall Common Farm should be retained in the CA to link the two rather than having a satellite area just linked by the road and to prevent development.</p> <p>Suggests we include allotments, last vestige of 'feudal strips for domestic food production and important feature of social history.</p>	<p>granted for demolition and redevelopment with 3 bungalows.</p> <p>The significance of these dwellings are borderline.</p> <p>Noted</p> <p>Do not reflect the ancient street pattern, but do form part of the history of village and the properties have some merit. Propose to retain in CA.</p> <p>Noted regarding rationalisation, but no strong justification for inclusion.</p> <p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Agreed to make sense of the boundary here it would be beneficial to include strip of land between the two plots – map amended.</p> <p>Noted and understood. However, historic maps and aerial images suggest these are of late 20th Century origin, so given these allotments are not historical it is not proposed for them to be included</p>
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	<p>Agrees with removal of fields but suggests boundary follows garden boundaries so retain buildings within CA.</p> <p>Suggests retaining plot to W of Heronway on Norwich Road within CA to control development</p> <p>Suggests assessing all sites within the CA (e.g. positive or negative contributors) with appropriate enhancement policies for negative sites.</p> <p>Keep informed of timetable for adoption</p> <p>Made us aware of planning permission to replace workshop on 12 School Road with 3x bungalows- Fri 14 Jun 2019- PF/19/0130</p>	<p>These properties are fairly modern and whilst pleasant it is not considered there is sufficient justification for retention within the CA.</p> <p>Noted, however, this is effectively a small field that is not considered to be appropriate to include as not sufficiently special. Should any development proposals come forward the impact on the setting of the adjoining CA would be considered.</p> <p>There is a list of buildings which make a positive contribution to the character of the CA in the appendix- Whilst this is a helpful reference and a technique used in some CAA, there would be concerns with highlighting negative contributors specifically given a high percentage are people's own homes. General areas for improvement have been highlighted also.</p> <p>Advised of current timetable</p> <p>Noted but as not built yet reference to workshop to be retained in appraisal</p> <p>Document amended</p>
Resident	<p>Our concern is that any narrowing of this space (behind village stores) due to planting, might cause difficulty for ourselves and delivery vehicles which may have to stop in the street.</p>	<p>Re-appraisal text amended accordingly</p> <p>Document amended</p>
Resident	<p>Concerns over removal of farmland from CA and thinks this would allow for development.</p>	<p>Advised that removal doesn't impact on the development potential of the areas</p> <p>No changes made to document</p>
Facebook Comment	<p>Why is the photo of Horning?</p>	<p>Photo was of St Benets Abbey, which is in Horning parish.</p> <p>Photo changed</p>

Facebook Comment	Has family connections to Ludham. A beautiful village.	Noted
Facebook Comment	Loves Ludham and walks around it. Particularly the shops, café, pub and church. The village is steeped in history with fabulous countryside.	Noted
Facebook Comment	Lovely walks. A peaceful, relaxing and calm place.	Noted
Facebook Comment	Unspoilt natural beauty.	Noted
Facebook Comment	Unspoilt walks.	Noted
Facebook Comment	Ludham is special in winter	Noted

From the statutory/amenity bodies consulted, responses were received as follows:

Organisation	Comment	BA response
Ludham Parish Council	No response	None
Historic England	No response	None
Norfolk County Council's Historic Environment Services	No comment	None
Councillor Richard Price (NCC)	No response	None
Councillor Adam Vardy (NNDC)	No response	None

Stalham Staithe Conservation Area Appraisal March 2017



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Introduction

Why have Conservation Areas?

A review of policies relating to the historic environment carried out by English Heritage (now Historic England) on behalf of the Secretary of States for Culture Media and Sport and the Environment Transport and the Regions was published in December 2000 under the heading 'Power of Place'.

The Report which reflected views now held generally by the population at large, confirmed 5 main messages:

- i Most people place a high value on the historic environment and think it right there should be public funding to preserve it.
- ii Because people care about their environment they want to be involved in decisions affecting it.
- iii The historic environment is seen by most people as a totality. They care about the whole of their environment.
- iv Everyone has a part to play caring for the historic environment. More will be achieved if we work together.
- v Everything rests in sound knowledge and understanding and takes account of the values people place on their surroundings.

In summary we must balance the need to care for the historic environment with the need for change. We need to understand the character of places and the significance people ascribe to them.

The concept of conservation areas was first introduced in the Civic Amenities Act 1967, in which local planning authorities were encouraged to determine which parts of their area could be defined as "Areas of Special Architectural or Historic Interest, the character or appearance of which it is desirable to preserve or enhance".

The importance of the 1967 Act was the first time recognition was given to the architectural or historic interest, not only of individual buildings but also to groups of buildings: the relationship of one building to another and the quality and the character of the spaces between them.

The duty of local planning authorities to designate conservation areas was embodied in the Town and Country Planning Act 1971, Section 277. Since then further legislation has sought to strengthen and protect these areas by reinforcing already established measures of planning control in the Planning (Listed Buildings and Conservation Areas) Act 1990, and now reflected in the National Planning Policy Framework (NPPF).

Unlike listed buildings, which are selected on national standards, the designation of Conservation Areas in the main is carried out at District level based upon criteria of local distinctiveness and the historic interest of an area as a whole. However, in the past, the criteria adopted by different local authorities in determining what constitutes a special area have tended to vary widely. For example, although public opinion seems to be overwhelmingly in favour of conserving and enhancing the familiar and cherished local scene, what is familiar to many, may only be cherished by some.

Over the last 30 years this approach has changed significantly. Much greater emphasis is now placed on involving the local community in evaluating 'what makes an area special', whether it should be designated and where boundaries should be drawn.

It is now recognised that the historical combination of local architectural style and the use of indigenous materials within the wider local landscape creates what has been termed 'local distinctiveness'. Distinctiveness varies within the relatively restricted confines of individual counties, which in turn are distinct in terms of the country as a whole.

Conservation Area designation for settlements and wider areas which embody this local distinctiveness may afford them protection against development which bears no relation to the locality either in terms of the buildings within it or landscape surrounding it.

The historical development of such settlements and their surrounding landscape are the 'journals' through which the social and economic development of the locality can be traced. The pattern of agricultural and industrial progress of settlements (their social history) is by definition expressed in the architecture and landscape of any area.

It is not intended (nor would it be desirable) to use Conservation Area designation as a way of preventing or restricting development, the expansion of a settlement or preventing contemporary innovative design. Logically in the future new development should add to, rather than detract from the character of an area and will in turn help to chart historical development. However, all development should seek to preserve and/or enhance the character and appearance of the area.

Aims and Objectives

The conservation area at Stalham Staithe was originally designated in 1991. This appraisal examines the historic settlement and special character of Stalham Staithe, reviews the boundaries of the conservation area and suggests areas for potential enhancement.

The appraisal will provide a sound basis for development management and encourage development initiatives which endeavour to improve and protect the conservation area as well as stimulate local interest and awareness of both problems and opportunities.

Planning Policy Context

The majority of the land and buildings in the Conservation Area are within the Broads Authority Executive area and the Broads Authority is responsible for all Planning matters in

these areas. North Norfolk District Council is responsible for planning matters in two areas of the existing conservation area, to the west and northwest of Mill Road.

There are a range of policies which affect Conservation Areas both within the Broads Authority and North Norfolk District Council areas, originating from both national and local sources. The latest national documents in respect of historic buildings and Conservation Areas are The Government's Statement on the Historic Environment for England 2010. The National Planning Policy Framework published in March 2012, and Planning Practice Guidance for the NPPF 2014, published by the Department for Communities and Local Government. The Broads Authority and North Norfolk District Council consider the various provisions contained in them in plan making and decision making.

Locally, in line with government policy, the Broads Authority and North Norfolk District Council are currently reviewing and revising local policies which will be published in the Local Plan (formerly the Local Development Framework (LDF)).

The Broads Authority has an adopted Core Strategy (2007) and Development Management Policies DPD (2011) and adopted Sites Specifics DPD (2014).

To support these policies, the Broads Authority provides further advice in a series of leaflets, which are currently being reviewed and expanded as part of the Local Plan process. A list of those currently available is attached in Appendix 3.

North Norfolk Local Development Framework: Core Strategy (adopted 2008) – relevant policies are:

- **Policy EN 8: Protecting and Enhancing the Historic Environment:** - Specifies that development proposals should preserve or enhance the character and appearance of designated assets (which includes conservation areas), other important historic buildings, structures, monuments and their settings through high quality, sensitive design.
- **Policy EN 2: Protection and Enhancement of Landscape and Settlement Character:** - Specifies criteria that proposals should have regard to, including the Landscape Character Assessment and distinctive settlement character and views into and out of conservation areas.
- **Policy EN 4: Design:** - Specifies criteria that proposals should have regard to, including the North Norfolk Design Guide.
- **North Norfolk Design Guide, Supplementary Planning Document (adopted 2008)** - Provides guidance to those involved in the management of the built environment and with the objective of improving design quality.
- **North Norfolk Landscape Character Assessment, Supplementary Planning Document (adopted 2009)** - Provides an assessment of the landscape character of the District with an objective of informing development proposals.

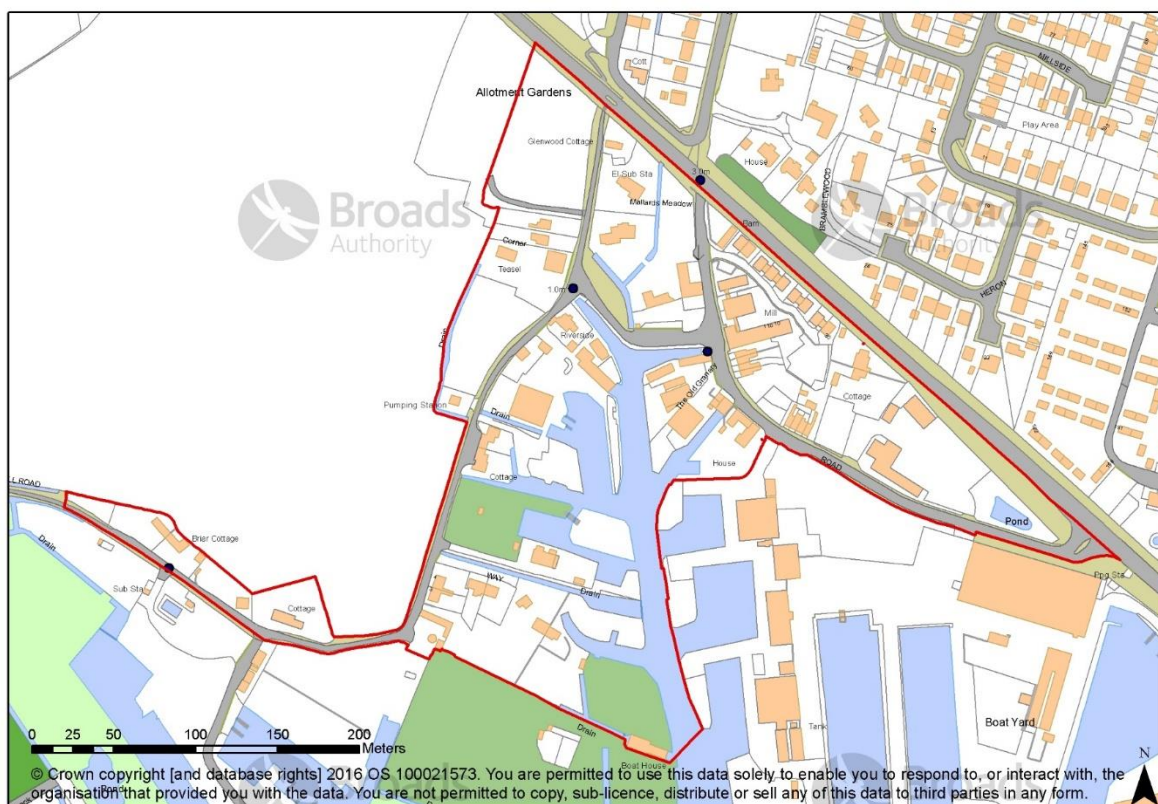
Summary of Special Interest

Stalham Staithe is a small settlement to the south of the town of Stalham. In contrast to the densely developed edge of the town to the north of the A149, the early development at Stalham Staithe is more informally sited around the historic staithe, which is bordered by a number of boatyards in a network of inlets and mooring basins at the head of Stalham Dyke which is connected to the northern part of the Broads via the River Ant. The Conservation Area contains many mature trees and is fringed by trees and alder carr giving it a verdant setting. Some large scale boatyard buildings outside the Conservation Area contrast with the generally domestic scale buildings of the historic settlement.

Location and Setting

The parish of Stalham is situated in North Norfolk at the head of Stalham Dyke, which runs north-eastwards from the upper River Ant in the northern part of the Broads waterway area. Stalham Staithe is a small settlement to the south of the town of Stalham, but separated from it by the A149 which connects Wroxham and Hoveton to Ludham. It is approximately 15 miles (24 km) north east of Norwich.

General settlement character and plan form



The Conservation Area of Stalham Staithe is roughly triangular in shape with the main part of the settlement grouped around the historic staithe on Staithe Road and extending to the

west to include the cottages on the north side of Mill Road. The historic development in the conservation area is mainly of a domestic scale, although some buildings formerly in commercial use are larger. Apart from the cottages on Mill Road, the buildings are grouped around the Staithe and the network of inlets and mooring basins associated with the neighbouring boatyards. The boatyard developments outside the Conservation Area include some large industrial type buildings which are of a different scale to the historic buildings and although their physical form does not contribute to the character of the Conservation Area, the activities associated with them contribute to the vibrancy of the area. Quiet in winter, the area is busy in the summer months with visitors in holiday mood as they come to hire boats for their time on the Broads.

Landscape setting

Stalham Staithe is set within the gently undulating shallow valley of the River Ant. This part of the Broads is known for being the least saline influenced of the Broadland fens and consequently the most diverse.

The historic development at Stalham Staithe is not easily seen from outside the settlement, hidden by mainly 20th century development from the A149 on the north-eastern edge; views from the south and west are terminated by trees and carr woodland. From the waterways, the boatyards and mooring basins dominate the views until the traditional buildings around the staithe are reached.

The Conservation Area is bordered to the north-west by a large arable field fringed by mature trees to the south and east marking the settlement around the staithe. Carr woodland around the water's edge to the east and west of the Conservation Area boundary lend a green fringe to the setting of the Conservation Area and mature trees within the Conservation Area contribute to its verdant character.

Historical Background

The Parish of Stalham

The Norfolk Historic Environment Service compiles records of known archaeological activity including sites, finds, cropmarks, earthworks, industrial remains, defensive structures and historic buildings in the county, in the Norfolk Historic Environment Record (NHER), and an abridged version can be accessed through the Norfolk Heritage Explorer website at www.heritage.norfolk.gov.uk. Records for Stalham parish date from pre-historic times with every period represented in some way.

The name Stalham may derive from the Old English meaning 'homestead by a pool' or 'homestead with stables'.

The parish of Stalham has a long history and was well established by the time of the Norman Conquest. Its population, land ownership and productive resources were detailed in the Domesday Book of 1086 which recorded that the parish contained rich agricultural land and valuable woodland, which suggested that during the medieval period the area around Stalham was a thriving farming community.

This is borne out by the enclosures and field boundaries recorded in the NHER suggesting that the land around Stalham was fertile and suitable for farming from the Roman period through the medieval to post medieval periods. Other records relating to the medieval period attest to the religious, social, domestic and commercial activities in the parish, including peat and turf cutting for fuel. By the post medieval period surrounding marshes were being drained by two windmills and a smock mill, and there was at least one corn mill in the district. Records also show that bricks were being made locally.

The opening of the Midland and Great Northern Joint Railway in 1880 which ran between Melton Constable & Great Yarmouth brought better communications with local towns for trade which gradually had a detrimental effect on commercial water borne traffic. However, it also heralded the heyday of the tourist trade on the river and Broads navigation channels which benefitted the town. Following the closure of the railway in 1959, the A149, which bypasses Stalham, was built along its line and the Stalham Station buildings were dismantled and rebuilt at the new Holt Station as part of North Norfolk Railway.

Stalham Staithe

Staithe (or landing places) were the local focal points of an area's economy before and after the coming of the railways. Although little is known about the early history of Stalham Staithe, it is likely that it was being used for water transport by 1810, when the Enclosure Map indicates a long dyke, divided in two at the end, with two small buildings to the south side on land that was the Poor's Allotment, where the Museum of the Broads is situated now. By 1841, the Stalham Tithe map shows two larger buildings replacing the original ones by the water. The land is marked on the map as belonging to Samuel Cooke, who had a new dyke cut into it and a tall brick building constructed at the end, now The Old Granary, where a date stone bears his initials, SCS and a date of 1808.

Only a small number of the records in the NHER are within the Stalham Staithe Conservation Area boundary. These include the Old Granary on Staithe Road and the remains of an early 19th century brick tower mill in Mill Road.

The Old Granary is the only listed building in the Conservation Area (Grade II) and is recorded in the list description as an 'excellent example of a rare industrial building'. The building operated as a wherry granary, with the river staithe running underneath the building to allow wherries to moor and load or unload grain through hatches from the building. The building is now a private house.

The mill and adjacent mill house on Mill Road were constructed around 1817. The mill had a 3 storey tarred brick tower with a Norfolk boat shaped cap and patent sails. It powered a flour mill via two pairs of stones. First known as Staithe Mill and later as Burton's Mill, it had fallen out of use by 1937, the upper part of the tower was demolished and during World War II the remaining lower storey was converted to an air raid shelter, with a reinforced concrete roof. The original mill formed part of a well-known local scene that was photographed in the late 19th century by all the eminent Broadland photographers, including PH Emerson, Payne Jennings and George Christopher Davies.

Two small cottages, known as Utopia and Arcadia also featured prominently in late 19th century photographs. Built of flint, and probably dating from the 18th century, the cottages were extended and altered using brick at some time during the 19th and again during the 20th century. Still in existence at the time of this survey, albeit in a very poor condition, Planning Approval was granted following an appeal in 2013, for their demolition and replacement with two semi-detached dwellings.

The settlement of Stalham Staithe grew up around the staithe and waterborne trade and the Burton family was instrumental in its development during the 19th and early 20th centuries. One of the buildings housing the Museum of the Broads, on the south side of Staithe Road, is dated 1820 with the initials RB. Although rendered and colour-washed now, it is constructed of Norfolk red brick, probably manufactured in the brick field and kiln on the north side of Staithe Road which is shown on maps as late as the mid 20th century. Goods such as malting barley and later sugar beet were stored for transportation in the building and the smaller brick building behind, from which they could be loaded directly onto wherries through doors on the dyke side. It is likely that the RB on the date stone is Robert Burton as there are members of the Burton family recorded as living at the Staithe from the early 1800s. It is also probable that they constructed and lived in The Staithe House on which a date stone is inscribed RB 1813. The land called Poor's Staithe (the site of the Museum) was leased from the Poores Trust, the rent collected going to the poor of the parish. Robert Burton at one time also owned the corn mill in Mill Road.

Kelly's Directory of 1883 records that *'The river Ant affords facilities for landing coal, corn, malt and all other kinds of merchandise'* and *'Water conveyance to Yarmouth from Mrs Sarah Burton's wharf'*.

In 1891, members of the Burton family were recorded as trading from The Poor's Staithe as Coal, Corn and Oil Merchants, using small wherries built in the area, at least one of which was constructed especially narrow to allow it to pass under the old Wayford Bridge to travel to North Walsham via the North Walsham and Dilham Canal. The Burtons were still leasing the Staithe land living at Staithe House in 1906, when the family was trading as Corn Merchants and Burton's coal yard was operating until shortly before The Museum of the Broads took over the buildings later in the century/1998. The Burtons also owned the former granary buildings now known as Burton's Mill (1909 and 1936) on Staithe Road, now in residential use.

Wherries are inextricably linked to the history of Stalham Staithe. They were the main means of carrying grain and other crops out of the area and bringing in fertiliser and coal. Manned by two men, they were once a common but impressive sight, with masts 40' high and a sail area of 1,200 sq ft. One of the Burtons' wherries, the Ceres, was constructed by Josiah Cubitt Teasel, who was listed as a boat builder at Stalham Staithe in 1881, on the site where Moonfleet Marine is now. Josiah had previously worked for prolific wherry builders the Southgate family at Sutton, and he was probably the first boat builder to occupy a site at Stalham. He lived at Stalham until his death in 1906, hiring out yachts, small rowing boats and a wherry from his yard, and is known to have built at least three wherries there. His wife Sarah continued the business for a few years before selling it to the Southgates who ran the boatyard up to the Second World War after which it became Stalham Yacht Services and then Moonfleet Marine continuing the tradition of boat hire from that site.

Other wherries known to have been trading from Stalham Staithe were owned by Robert Cooke, a wealthy local farmer, brick maker, merchant and miller who died in 1881, who must have used his craft to carry bricks, corn and other crops to and from the staithe. Smaller boats carried other local goods such as sedge (known as litter) which was used for stuffing horse collars and thatching.

With improved road and rail transport, the traditional, small scale transport and storage activities dwindled and by the mid to late 20th century commercial activity around the staithe was almost entirely connected to the tourist industry, boat-building firms, boatyards hiring craft to visitors or other supporting businesses. The intensification of this industry led to the construction of large scale industrial type buildings, and although these are mainly outside the Conservation Area, they have had an effect on the character of the staithe providing a contrast in scale between the traditional buildings and the later ones. The 19th century buildings around the staithe are constructed of local red brick with red or black pantiled roofs. Maps prior to 1950 (but not that of 1957) indicate a kiln and 'brick field' on the site now occupied by C.T. Baker. Although it is known that other brickfields existed in the Stalham area, it is likely that this local site supplied the materials for the earlier houses and cottages.

Although outside the conservation area boundary, Richardson's boatyard has played a significant part in the development of The Staithe as a major centre for Broads holidays. Originally operating a hire fleet from Oulton Broad, the company moved to a larger site in Stalham in the late 1950s. Fifteen years later, the original site had expanded to create the largest boatyard on the whole of the Norfolk and Suffolk Broads, with a subsidiary company building fibreglass hire craft. In 1974, the whole of the Stalham boatyard with its fleet of 244 cruisers was sold to the Rank Organisation and the Richardson's boat building operation moved to Catfield, later hiring out boats from Acle. The company bought back the Stalham boatyard from Rank in 1984, the fleet, which had deteriorated badly, was renovated, and the boatyard continues to operate from Stalham, adding to the vibrancy of the area and the waterways, particularly during summer months. In 1998, the Museum of the Broads relocated its premises from Potter Heigham. The museum records and illustrates the history of the Norfolk and Suffolk Broads and explores how people's lives have shaped the landscape through archive material, exhibits and artefacts including Falcon, a working steam launch which makes regular trips on the river for visitors. Whilst only open to the public during the summer months, activity at the museum continues throughout the year when volunteers maintain and refresh the exhibits. The museum attracts many visitors, not only those who are hiring boats nearby but also those who make a special trip to visit it, which adds to the vitality of the Conservation Area.

In recent years Stalham Staithe has become a popular centre for visitors to stay for holidays to explore the Broads area, for boating and for fishing. This is mainly in self catering accommodation including part of Burton's Mill and some of the cottages. If this trend continues, it will inevitably have an effect on the character of the Conservation Area with activity concentrated in the summer months.

Spatial and Character Analysis

Staithe Road

From the A149 to the north there is no visual hint of the historic core of the conservation area as trees and a tall hedge allow only glimpses of the new development at Burton's Mill, a white cottage (Mill View) and the commercial premises of C.T. Baker's builder's merchants yard.

The main approach into Stalham Staithe for vehicles is a relatively recent slip-road from the A149 via Staithe Road, past commercial premises to either side, which tend to give it an industrial feel. The southern side of the road forms the Conservation Area boundary and beyond this a large scale, long span metal clad building of Richardson's boatyard dominates the view, followed by an open storage area for the boatyard. The north-east side of Staithe Road to the A149 is within the Conservation Area; at the entrance to the road on a triangular piece of land, semi-mature trees and a small pond are in the curtilage of the builder's merchants, C.T. Baker Ltd. Baker's yard is open to view via the vehicle entrances either side of their offices in a recently constructed red brick building sited close to the road and designed to echo the form of terraced cottages further into the conservation area. A date stone in the gable of the office building records 'CT Baker 2006' and is reflects other, 19th century date stones in the Conservation Area. Black chain link fencing and gates enclose narrow grassed areas on the perimeter of the Baker's site. Additional planting to supplement the recently planted trees would soften this main entrance to the Conservation Area.

A yew hedge next to Baker's premises encloses the garden area to Mill View, which is set back towards the main A149 road and approached via a lobe from Staithe Road. Mill View is a white painted brick house possibly dating from the late 19th century and altered in the 20th century. The 1885 Ordnance Survey map shows a row of four cottages on this site and on the east side of the lobe a block of four small outhouses built of brick and un-knapped field flints may once have served the former cottages.

Beyond the lobe, as Staithe Road begins a gentle curve, the 19th century character of the area is more apparent, with on the east side, Cordova Cottages, four late nineteenth century red brick cottages of a traditional terraced design with pantile roofs, the ridge running parallel to the road. Their red brick front garden walls topped with bull-nose red brick copings are an attractive feature. It would appear that the rear gardens to the cottages have been truncated with a variety of fences to form an informal parking area.

Further on, another terrace of four houses of a similar design, Riversdale Cottages, has the same boundary wall treatment. A vacant site between the two terraces was granted Planning Approval in 2013 for four new houses with parking behind, accessed via an arch, which will enclose the street scene in this part of the Conservation Area.

Opposite this site and Riversdale Cottages are a group of traditional buildings backing onto the water – first Staithe Marsh House, a 19th century, two storey rendered house and then The Old Granary, which is the only listed building in the settlement. Both contribute to the

character of the area, but the latter is an unusual and striking building and the tallest in the Conservation Area.

Next to The Old Granary and set back from the road is a large timber clad gable of a boat building company. This traditional design is echoed next door in some of the group of buildings that house The Museum of the Broads. A 20th century curved roof open area links earlier buildings, some clad in timber, others in corrugated metal and those on the corner of Staithe Road in local red brick and rendered brick. The building on the corner is gable end to the road with a date stone at its apex inscribed with 'RB 1820'.

Opposite the Museum of the Broads are three red brick buildings known as Burton's Mill linked at first floor level with 20th century timber clad 'bridges'. In contrast to the smaller scale terraced cottages, the two earlier sections of the buildings present their gables to the road and this is echoed, albeit on a smaller scale, in the 21st century addition at the northern end. The two original gables have date stones in their apex, the first in terracotta inscribed 'HB 1909' and the second a greatly eroded stone which possibly reads 'HB 1936', indicating dates for their construction and that they were part of the Burton family holdings. There is an attractive wrought iron lamp bracket above the former loading door on the later gable. These buildings were converted to residential use earlier this century, and as part of the scheme, additional dwellings were built on the site to the rear, beside the A149, echoing the design form of Burton's Mill, with a series of smaller scale linked gables facing the access road. This is the largest recent development in the Conservation Area and whilst the design and materials are sympathetic to their surroundings, accommodating vehicle access and sufficient parking has produced open areas of hard landscaping. This and the communal gardens could be softened with additional landscaping and planting.

Two late 19th or early 20th century single storey buildings at the northern tip of the site were also converted to residential use and the retention of their scale and materials add to the character of the Conservation Area.

Staithe House, in a prominent corner position overlooking the staithe, is a symmetrically designed early 19th century red brick house with a black glazed pantiled roof. Built to impress, albeit in a modest way, the date stone in the gable reads 'RB 1813' announcing the Burton family residence. Behind the house is a generous garden with mature trees which are a prominent feature and enhance the setting of the settlement as does the high flint and brick garden wall.

Staithe Road divides in front of Staithe House with one section (originally Lower Staithe road) continuing northwards towards the A149 where it is closed for vehicles; the highway now crosses through the historic staithe area to join what was formerly Upper Staithe road then turns into Mill Road to the west. To the north of the staithe and forming a group with Staithe House, a single storey brick and flint building with a prominent gable faces the road. It appears to date from around the same period as Staithe House and may well have been associated with the Burton businesses, but was converted to the Mermaids Slipper Restaurant in the early 21st century.

As the road follows the edge of the staithe, the waterside activities become apparent, boats and boatsheds become visible and southwards, there is a long view along the inlet with a

backdrop of trees and alder carr in the distance. The area at the head of the staithe is effectively the main focal point of the conservation area. Burton's Mill, Staithe House, the adjoining Mermaid's Slipper Restaurant and the traditional buildings of the Museum of the Broads provide some sense of enclosure. Opposite the staithe, there is an area of hardstanding which possibly demarcates the extent of the staithe. This area could be given a more cohesive character if the line of the road was better defined, for example through a change of surface material for the hardstanding. The grassed area in front of the restaurant visually draws together and lends a sense of the whole historic area of the staithe.

To the west of The Mermaid's Slipper, is an area of open space, currently grassed with seats, a picnic bench and planters, it is flanked by a watercourse and mature trees and separated from the road by a low timber rail. This attractive and relaxing space enjoys the long views South along Stalham dyke. Limited hard surfacing to enable it to be used all the year round might be beneficial. The space is ideally situated in the centre of the conservation area. On the opposite side of the road the twin gabled roofs of 1 Old Yacht Station stand out at the road junction. The corrugated iron cladding, timber bargeboards and the green and cream colour scheme epitomises the working waterside buildings of the Broads. The more recent industrial unit adjacent takes a similar form using modern materials and it sits comfortably within the area, a continuation of commercial activity around the staithe although it does not make the same historic contribution to the character of the Conservation Area.

The northern section of Mill Road is a leafy lane with mature trees on either side, becoming a pedestrian access to the A149. A late 20th century house, mid 20th century bungalows to the west differ in character to the rest of the area as does the electricity sub-station immediately adjacent to the A149 and the open field and pumping station further south and to the west of Mill Road.. The Allotments to the North West have been on the site since the early 1900's and following a reduction in size of individual plots and the introduction of mains water they are well used once more. On the east side a 21st century house built in part of the former garden to Staithe House is almost hidden behind a hedge and mature trees. The contemporary design makes an interesting contribution to the character of the area and its timber cladding is in harmony with its surroundings.

At the junction of Staithe Road and Mill Road, a late 19th century red brick and pantile house is orientated to overlook the staithe. Prominent on the staithe, Moonfleet Marine was constructed in the 20th century on the site of an earlier building. Clad in timber with a pantile roof, its straightforward form is reminiscent of traditional waterside buildings and it makes a positive contribution to the Conservation Area.

Mill Road.

The character of the Conservation Area becomes more rural as Mill Road curves south-westwards, with traditional cottages backing onto the low lying water side and open countryside to the West. Whilst there is little open water visible from the road, boatyard activities are apparent on the eastern side of Mill Road where lokes leading down to the water enable glimpses of brightly coloured boats in mooring basins. Larger scale boatyard buildings set back from the road behind working and casual storage areas contrast with the neat front forecourts of the smaller scale cottages closer to the road. Two pairs of cottages,

both built with roofs running parallel to the road, the first rendered and the second in local red brickare separated by an area of undeveloped land. Whilst the trees here make a contribution to the character of the area, the site also appears to be used for informal storage which at the time of the appraisal detracts from the semi-rural character of the area. Opposite to the West side of Mill Road are the open field and pumping station mentioned previously. Mill Road makes a sharp right hand bend to the west on which is Mill House, a long two storey, colour washed brick cottage built at right angles to the road and the remains of the brick tower of the corn mill. Now truncated it was much photographed in the 19th century, at its full height, it would have been have been a prominent feature in this part of the settlement.

Around the corner, Mill Road becomes a narrow lane enclosed by hedges either side of holly and ivy which are a distinctive feature, enclosing a camping area and marina to the south, outside the Conservation Area. On the north side of the road within the Conservation Area are four traditional cottages, the first two detached in large gardens with colour washed brick or rendered walls and pantile roofs. At the western most tip of the Conservation Area is a pair of low two storey brick and pantile cottages. The pent (small lean-to) roofs over canted bays with small gabled porches are a most unusual feature. Mature trees and traditionally designed garages or outbuildings in this part of Mill Lane add character to it.

Architectural styles and materials

Although only one building within the Conservation Area boundary is included in the Secretary of State's list of buildings of special architectural or historic interest (Appendix 1), there are a number of buildings which are considered to make a positive contribution to the character of the Conservation Area which are noted in Appendix 2.

The majority of buildings at Stalham Staithe date from the early 19th century, and although it is possible that the staithe may have been used for local water transport before that date, no earlier buildings survive. With no prevalent architectural style, as would be found for example in planned suburban areas, there is a variety of building designs, with a contrast of scale between commercial and domestic uses. The Old Granary and Burton's Mill, and to a lesser extent the earlier buildings at The Museum of the Broads, are of a larger scale than the cottages on Mill Road and tend to have their gables facing the road to provide height for storage and make the most of narrow plots at right angles to the road. The domestic terraces and pairs of cottages are generally built for ease of construction, with roof ridges following the line of the roads, although there are exceptions, such as Vine Cottage. It is possible that the Burton family planned the siting of their buildings; certainly Staithe House and Burton's Mill are in prominent positions. The Old Granary is built to take advantage of the waterway of the staithe for loading wherries.

There is some consistency of materials with locally made red or black glazed pantiles and red brick, the latter possibly from the brick field on the staithe until the mid 20th century. Slates were a popular roofing material in the 19th century, but unusually there are none in Stalham Staithe, possibly because they would have been more expensive than locally available materials as they would have had to be brought in from another part of the country. Local flints, trimmed with bricks were also used, generally as a utilitarian material

such as those in the the outhouses on the loken to Mill View, the garden wall to Staithe House and the walls of The Mermaid's Slipper Restaurant, which was probably an outbuilding to the house. Earlier watercraft buildings utilise corrugated iron (The Old Yacht Station) and timber boarding (John Williams Boats). More recent buildings have followed the earlier precedents; brick and pantile for the extensions to Burton's Mill and timber cladding to Moonfleet Marine. The most recent building, a new house on the northern section of Mill Lane uses timber in a contemporary manner.

The larger 20th century boatyard buildings are generally outside the Conservation Area and although they often use modern materials of a similar profile to the historic ones, the larger scale spans are out of character with the buildings in the earlier settlement.

Ground surface treatments, private and public realm.

Roads in the Conservation Area are finished with asphalt; the absence of formal pavements adds to the character of the historic Staithe. On private land, gravel is the most usually used and is a sympathetic material for the Conservation Area.

Barriers are limited around the open aspect of the staithe, which is visually pleasing, and the low-key timber rails around the picnic area are unobtrusive. Grassed verges provide a more rural character within the settlement and generally should be preserved.

Trees, hedges and boundary treatments.

Trees and hedges are significant elements in the Conservation Area and outside it, providing a green backdrop to the settlement. Notable areas in the Conservation Area are:

- Trees in the garden of Staithe House and on the land to the north of The Staithe
- Hedges and trees on land to the west of Mill Road
- Trees beyond the cottages at the west of the conservation area
- Hedges on both sides of Mill Road beyond Mill House

The tall hedge and trees along the A149 soften the appearance of the new development at the rear of Staithe Road.

The removal of hedges and traditional boundary walls, particularly to provide parking in front gardens can have an adverse impact on the setting of buildings and the overall street scene. Additional planting and/or more traditional fences can help to define public and private space and contribute to rural character.

The brick front boundary walls to Riversdale and Cordova Terraces and the flint and brick garden wall to Staithe House contribute to the character of the Conservation Area. The chain link fences around the builder's merchant compound have already been commented on.

Issues, pressures and opportunities for improvements

Generally the buildings and gardens in the Conservation Area are well maintained and there are no structures that would qualify to be on the Buildings at Risk Register. However, redundant structures and storage areas on some sites are negative factors in the Conservation Area.

The special character of conservation areas can easily be eroded by seemingly minor, and well intentioned, home improvements such as the insertion of replacement windows and doors with ones of an inappropriate design or material, (for example hinged opening lights in lieu of sash windows and UPVC instead of painted timber). This can be a particular issue with unlisted buildings that have been identified as contributing to the character of the Conservation Area. In line with current legislation, all complete window replacements are required to achieve minimum insulation values, but recognising the affect that inappropriate replacements can have, Local Authorities can relax that requirement when considering the restoration or conversion of certain buildings within conservation areas, and advice should be sought from the Local Authority at an early stage.

Suggested areas for improvements

Staithe Road

- Consider additional planting around Bakers builders merchants site to soften the effect of the chain link fencing and provide some screening of the storage area
- Consider additional soft landscaping to the car parking and communal areas behind Burton's Mill
- Consider the public realm in front of The Mermaid's Slipper Restaurant and an alternative surface material for the hard standing to define the historic area of the staithe.
- Consider the management of informal car parking around the staithe.
- Consider the provision of limited hard surfacing to improve access to the landscaped picnic /amenity area area immediately to the North of the staithe
- Consider improvements to the condition of the dyke wall at the North East end and management of parking and improvement of surfacing along the moorings.

Areas for consideration as part of consultation process.

The boundaries to the Conservation Area are as illustrated on the accompanying map and as described in the text. As part of the consultation process it was suggested consideration might be given as to the retention of the following areas within the conservation area. The 2 single storey dwellings, late 20th century house, field and pumping station to the west of Mill Road. The electricity sub-station at the North East end of Mill road immediately adjacent to the A149. Following consultation the existing boundary of the Conservation Area is considered appropriate and remains unchanged from the 1991 designation.

Public consultation

Consultation with interested parties and organisations was carried out in accordance with the Broads Authority 'Statement of Community Involvement'. A joint consultation exercise was undertaken with North Norfolk District Council as the proposed conservation area boundaries include land in both planning authority areas as defined on the maps included in the character appraisals. A letter and leaflet were delivered to all residents and businesses within the conservation area boundary, and copies of the appraisal documents were made available both online and in hard copy format in the Broads Authority offices. The leaflet included a comments section and consultees were also able to comment on line. A public exhibition was held on 5 March 2016

Appendix 1: Listed buildings in the conservation area

The Old Granary, Staithe Road. Grade II

Appendix 2: Unlisted buildings that make a positive contribution to the character of the conservation area. *(Within the Broads Authority executive area unless otherwise noted.)*

Whilst the following buildings and boundary walls within the Conservation Area do not merit full statutory protection, they are considered to be of local architectural or historic interest, and every effort should be made to maintain their contribution to the character of the Conservation Area. The following structures have been identified and are considered as undesignated heritage assets.

Staithe Road

- Flint and brick outhouses on loke to Mill View
- Riversdale cottages & front boundary walls
- Cordova Cottages & front boundary walls
- Burtons Mill - former warehouses fronting Staithe Road
- No. 21 (Staithe Barn)
- Staithe House, outbuildings & garden wall
- Mermaids Slipper Restaurant
- Granary (redeveloped in 2008)
- Staithe Marsh House
- John Williams Boats - boatbuilding shed
- Museum of the Broads – boatbuilding sheds
- Museum of the Broads - rendered & colour-washed former storage warehouse
- Museum of the Broads – brick former storage warehouse beside Staithe

Mill Road

- Green & cream commercial sheds at 1 Old Yacht Station (NNDC area)
- Moonfleet Marine
- Riverside
- Vine Cottage
- 20c corrugated clad boatshed
- Alder Cottage
- Rose Cottage
- 1 & 2 Utopia Way

- Wilkins Cottage
- Goffins Cottage
- Mill House & remains of windmill
- Nightingale Cottage (NNDC)
- Toad Hall (NNDC)
- Briar Cottage & Garage/outhouse to Briar Cottage (NNDC)
- Haven Cottage (NNDC)

Appendix 3: Broads Authority Guidance leaflets

- Keeping the Broads Special
- Do I need Planning Permission?
- How do I apply for Planning Permission?
- Building at the Waterside – A guide to design of waterside buildings in the Broads Authority area
- Environment and Landscape – How do I plan and manage trees and scrub alongside rivers?
- Development and Flood Risk in the Broads
- Riverbank Protection Works – A guide for riparian landowners
- Sustainability Guide – Sustainable development in the Broads

Appendix 4: Contact details and further information

The Broads Authority
 Yare House
 62 – 64 Thorpe Road
 Norwich
 NR1 1RY
 Tel: 01603 610734
 Website: www.broads-authority.gov.uk

North Norfolk District Council
 Council Offices
 Holt Road
 Cromer
 Norfolk
 NR27 9EN
 Tel: 01263 513811
 Website: www.northnorfolk.org

Norfolk Historic Environment Service

Union House
Gressenhall
Dereham,
Norfolk NR20 4DR
Tel 01362 869280
Website: www.heritage.norfolk.gov.uk

Appendix 5: References and sources of information

Publications

- A Popular Guide to Norfolk Place names, James Rye, The Larks Press, 1991
- The Buildings of England, Norfolk 2: North-west and South, Nicholas Pevsner and Bill Wilson, 1999
- The Norfolk Broads, A Landscape History, Tom Williamson, Manchester University Press 1997
- National Planning Policy Framework, 2012, DCLG
- Planning Practice Guidance for NPPF, 2014, DCLG
- Understanding Place, Conservation Area Designation, Appraisal and Management, English Heritage 2010
- National Heritage List for England
- Norfolk Heritage Explorer
- Norfolk Heritage Environment Record, Norfolk Landscape Archaeology, Gressenhall
- Ordnance Survey maps 1885, 1906, 1950, 1957
- A – Z of Norfolk Windmills, Mike Page & Alison Yardy, 2011
- Kelly's Directories for Norfolk, 1883, 1888, 1900
- William White's History, Gazetteer, and Directory of Norfolk 1845, 1854, 1883
- The Museum of the Broads, Annual Report, 2011
- Stalham Then and Now, & Stalham, Glimpses of the Past, Ray Woolston
- Broads Authority Landscape Character Assessment – Ant Valley – Downstream of Wayford Bridge
- www.norfolk Mills.co.uk
- www.tournorfolk.co.uk
- www.museumofthebroads.org.uk

Ludham Conservation Area Appraisal August 2020



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Introduction

Why have conservation areas?

A review of policies relating to the historic environment carried out by Historic England (then known as English Heritage) on behalf of the Secretary of States for Culture Media and Sport and the Environment Transport and the Regions was published in December 2000 under the heading ‘Power of Place’. More recent research on the value and impact of heritage on many factors including growth, the economy, our wellbeing and sense of place is summarised in the annual Heritage Counts report (Historic England).

The Power of Place report, which reflected views now held generally by the population at large, confirmed 5 main messages

1. Most people place a high value on the historic environment and think it right there should be public funding to preserve it.
2. Because people care about their environment they want to be involved in decisions affecting it.
3. The historic environment is seen by most people as a totality. They care about the whole of their environment.

4. Everyone has a part to play caring for the historic environment. More will be achieved if we work together.
5. Everything rests in sound knowledge and understanding and takes account of the values people place on their surroundings.

In summary we must balance the need to care for the historic environment with the need for change. We need to understand the character of places and the significance people ascribe to them.

The concept of conservation areas was first introduced in the Civic Amenities Act 1967, in which local planning authorities were encouraged to determine which parts of their area could be defined as “Areas of Special Architectural or Historic Interest, the character or appearance of which it is desirable to preserve or enhance”.

The importance of the 1967 Act was for the first time recognition was given to the architectural or historic interest, not only of individual buildings but also to groups of buildings: the relationship of one building to another and the quality and the character of the spaces between them.

The duty of local planning authorities to designate conservation areas was embodied in the Town and Country Planning Act 1971, Section 277. Since then further legislation has sought to strengthen and protect these areas by reinforcing already established measures of planning control in the Planning (Listed Buildings and Conservation Areas) Act 1990, and now reflected in the 2018 National Planning Policy Framework (NPPF).

This appraisal takes account of the guidance in Historic England Advice Note 1 (updated in 2019 in the light of the NPPF) supporting the management of change in a way that conserves and enhances the character and appearance of historic areas through conservation area appraisal, designation and management.

Unlike Listed Buildings, which are selected on national standards, the designation of conservation areas in the main is carried out at District level based upon criteria of local distinctiveness and the historic interest of an area as a whole. However, in the past, the criteria adopted by different local authorities in determining what constitutes a special area have tended to vary widely. For example, although public opinion seems to be overwhelmingly in favour of conserving and enhancing the familiar and cherished local scene, what is familiar to many, may only be cherished by some.

Over the last 30 years this approach has changed significantly. Much greater emphasis is now placed on involving the local community in evaluating ‘what makes an area special’, whether it should be designated and where boundaries should be drawn.

It is now recognised that the historical combination of local architectural style and the use of indigenous materials within the wider local landscape creates what has been termed ‘local distinctiveness’. Distinctiveness varies within the relatively restricted confines of individual counties, which in turn are distinct in terms of the country as a whole.

Conservation area designation for settlements and wider areas which embody this local distinctiveness may afford them protection against development which bears no relation to the locality either in terms of the buildings within it or landscape surrounding it.

The historical development of such settlements and their surrounding landscape are the 'journals' through which the social and economic development of the locality can be traced. The pattern of agricultural and industrial progress of settlements (their social history) is by definition expressed in the architecture and landscape of any area – the historic environment.

It is not intended (nor would it be desirable) to use conservation area designation as a way of preventing or restricting development, the expansion of a settlement or preventing contemporary innovative design. Logically in the future new development should add to, rather than detract from the character of an area and will in turn help to chart historical development. However, all development should seek to preserve and/or enhance the character and appearance of the area.

Aims and Objectives

Ludham conservation area was originally designated in 1974, this appraisal examines the historic settlement and special character of Ludham, reviews the boundaries of the conservation area and suggests areas where enhancements could be made.

The appraisal will provide a sound basis for development management and encourage development initiatives which endeavour to improve and protect the conservation area as well as stimulating local interest and awareness of both problems and opportunities.

What does designation mean for me?

To protect and enhance the conservation area, any changes that take place should positively conserve the character and special interest that make it significant. Statutory control measures are intended to prevent development that may have a negative or cumulative effect on this significance. The additional controls in conservation areas include:

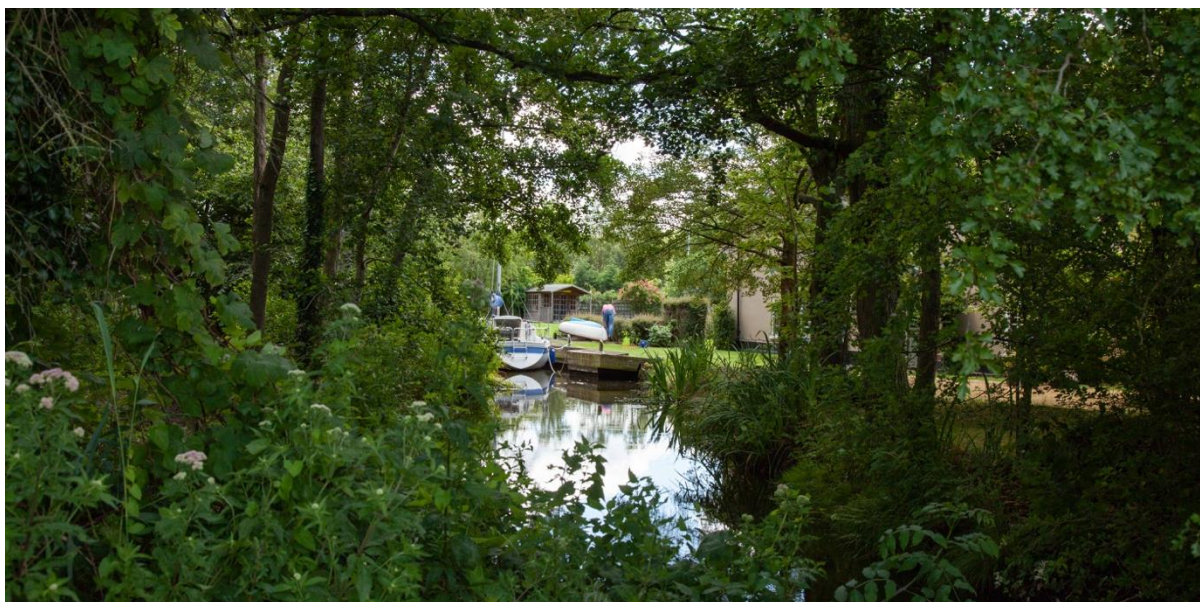
The extent of Permitted Development Rights: Permitted Development Rights (i.e. changes that are allowed without requiring planning permission from the local authority) may be restricted; for example, replacement windows, alterations to cladding or the installation of satellite dishes, removing chimneys, adding conservatories or other extensions, laying paving or building walls. Changing the use of a building (e.g. from residential to commercial) will require planning permission. The types of alterations/development that need permission can be altered by the local authority by the making of Article 4 Directions. It is therefore advisable to check before making arrangements to start any work.

Demolition

Demolition or substantial demolition of a building within a conservation area will usually require permission from the local authority

Trees

If you are thinking of cutting down a tree or doing any pruning work to a tree within a conservation area you must notify the local authority 6 weeks in advance. This is to give the local authority time to assess the contribution that the tree makes to the character of the conservation area and decide whether to make a Tree Preservation Order.



Trees within Conservation Areas are specially protected

Advertisements

Advertisements and other commercial signage may be subject to additional controls and/or require planning permission.

If you require tailored planning advice or need assistance regarding a specific development proposal within the conservation area, the Broads Authority and North Norfolk District Council offer pre-application advice services.

Current Planning Policy Context

Land and buildings in the conservation area lie within both the Broads Authority Executive area and North Norfolk District Council area.

There are a range of policies which affect conservation areas within both the Broads Authority and North Norfolk District Council areas, originating from both national and local sources. The latest national documents in respect of historic buildings and conservation areas are The Government's Statement on the Historic Environment for England 2010. The National Planning Policy Framework published in March 2012 (revised February 2019) and the Planning Practice Guidance for the NPPF 2016 (revised July 2019), published by the Ministry of Housing, Communities and Local Government. The Broads Authority and North Norfolk District Council use these documents in plan making and decision making.

Locally, in line with government requirements, the Broad Authority adopted a new Local Plan in May 2019. North Norfolk District Council, at the time of writing, were in the early stages of reviewing their policies as they produce a new Local Plan.

To support these policies, the Broads Authority provides further advice in a series of leaflets, which are currently being reviewed and expanded as part of the Local Plan process.

For a list of relevant local planning policies, guidance and supporting documents please see Appendix 3.

Please note: both national and local planning policies, supporting documents and guidance are updated periodically, whilst this policy context was relevant at the time of the writing of the report please check with the relevant Authority for updates.

The Appraisal

Preamble

The existing conservation area includes land and buildings in both the Broads Authority and North Norfolk District Council areas. This appraisal is being carried out by the Broads Authority in consultation with North Norfolk District Council.

The appraisal considers the existing conservation area and proposes amendments to the conservation area boundary in both Planning Authority areas. The reasons for these are set out in the remainder of the document. The following sections cover the whole of the proposed conservation area. The spatial analysis is divided into three character areas:

1. The village centre
2. Horsefen Road and Womack Water
3. Staithe Road and Cold Harbour Road



Ludham, a picture postcard village

Summary of Special Interest

Often spoken of as a 'picture postcard village', Ludham is a well preserved Broadland village centred around the Church. Its historic core remains almost completely intact and contains many buildings of historic interest. There are some fine examples of the use of local building materials such as thatch, pantiles, red brick, and render all of which help to define the special character of the area. Like many small villages, Ludham has seen later phases of development, however this is mainly outside of the clearly identifiable historic core. The buildings within the older part of the settlement are largely unaltered as is their historic relationship with the water, which remains a defining characteristic of the village. Womack Water and the head of Staithe are key features of the village, where there is a public interface with the water. As well as the residential extensions to the village Ludham played an active part during WWII, with an airfield built to the north east and an Army camp built between Norwich Road and School Road.



Local building materials

Today Ludham remains a popular destination for holidaymakers who often access the village via the moorings at Womack Water.

Location and Context

Ludham parish is located 13 miles north east of Norwich and north west of Great Yarmouth in the northern Broads area. Unusually, it is bounded by three rivers, the Ant, Bure (although the parish boundary is to the north of the Bure along Hundred Dyke) and the Thurne and it has its own small broad, Womack Water. The parish covers an area of just over 12 km².

General Character and Plan Form

Ludham village is centred around the crossroads of a minor road running north to south and the A1062, Norwich to Great Yarmouth road running west to east. St Catherine's Church is a prominent building in the village centre. This area and Staithe Road to the south contain the majority of the historic development within the settlement. 20th century development generally lies to the north of the A1062. The conservation area extends south from the main

road along Horsefen Road to Womack Water and along Staithe Road, which are more rural in character.



Staithe Road has a rural character

Geological background

Deposits laid down on the sea bed many millions of years ago formed Cretaceous Chalk which underlies the whole of Norfolk. It is the oldest rock type to be found in East Anglia, with an approximate age of 100 million years, and because it was subjected to smoothing glacial action, it provides a much more subdued topography than in other areas of Britain. The chalk deposits were subsequently overlain in Pleistocene times by a series of sand, muds and gravels, and these shelly sand deposits are known as 'Crag'. They bore the first brunt of the Ice Age as large glaciers moved into East Anglia from the north; the action of the ice moving over the loose deposits contorted the underlying material into complex thrust-type folds, known as 'contorted drift'. During the Ice Ages, rivers carved out wide but shallow valleys, with minor tributaries such as that at Womack Water. The silty clay soils produced the lush grazing meadows found in large areas of the Broads fringed by alder carr woodland. Peat is found towards the valley sides and sandy clay soils in the fertile agricultural land on the higher upland as can be seen to the north of Ludham. Extensive peat extraction in medieval times formed the Broads which are a particular feature of the area.



Sailing at Womack Water

Historic Development

Archaeology and early development of the Parish

The name Ludham derives from the Old English, Luda's Ham or 'Luda's home stead'. The parish has a long history and was well established by the time of the Norman Conquest, its population, land ownership and productive resources being extensively detailed in the Domesday Book of 1086.



The name Ludham derives from the Old English, Luda's Ham or 'Luda's home stead'

Norfolk County Council's Historic Environment Service compiles records of areas of known archaeological activity, sites, finds, cropmarks, earthworks, industrial remains, defensive structures and historic buildings in the county, in the Norfolk Historic Environment Record (NHER). There are an unusual number of records on the NHER for Ludham parish, 159 in total, and although many of them are outside the conservation area, they demonstrate the long history of the area.

The early history of the parish is somewhat patchy. A few prehistoric, worked flint instruments provide the earliest evidence of human activity in the parish, and then there is a chronological gap until the Bronze Age. Evidence from this period is provided by three copper alloy axeheads, a late Bronze Age flint dagger and, from aerial photographs, crop marks of two possible Bronze Age ring ditches and the flattened remains of circular burial mounds. Iron Age finds have yet to be definitely identified. During the Roman occupation, much of the area known as the Norfolk Broads was a broad estuary and the area where Ludham stands would have been a low-lying marshy area. Roman finds include coins and the crop marks of a possible military camp or settlement to the west of the parish. There is currently no evidence of Saxon activity, although it is thought that the village was in existence in that period.

The medieval St Catherine's Church is the oldest surviving building in the centre of the village, and although no other medieval buildings survive, examples of medieval finds include pottery fragments, buckles, a Papal bull and a forged silver coin. Even before the Norman Conquest, the village had a close connection with St Benet's Abbey on the banks of the River Bure in the neighbouring parish of Horning. St Benet's Abbey was endowed with several manors, one of which was Ludham. Successive Bishops of Norwich spent much of their time at their country seat at Ludham Hall, outside the main village, which might explain the size and fine quality of construction of St Catherine's, reflecting the great wealth of the population when it was built in the 14th and 15th centuries, replacing an earlier, less impressive structure.



The medieval St Catherine's Church is the oldest surviving building in the centre of the village

During the Middle Ages, Norfolk was a prosperous part of England, and Ludham flourished in an area where crops grew easily and sheep and cattle could be kept and fattened on the higher ground around the parish and the lush grazing marshes of the Rivers Ant and Thurne.

Womack Water occupies a minor tributary valley and is a former medieval turbary (common ground for peat or turf cutting) and later a broad, although now diminished from its former size. Peat was a valuable source of fuel during the medieval and post medieval periods where timber was in short supply and consequently an important part of the local economy. The landscape was transformed by peat cutting; man-made peat cuttings left behind depressions and low lying areas that gradually filled up with water as sea levels rose, forming what are now known as the Norfolk and Suffolk Broads. From the late 19th century,

various writers commented on the picturesque qualities of Womack Water which included gently decaying timber boathouses tucked amongst the surrounding trees.

Later development in the Parish

Notable post medieval buildings in the parish include Ludham Hall, the site of the Palace of the Bishops of Norwich, which burnt down in 1611 and was later partially rebuilt and a chapel added in 1627. The current flint and brick building is late 18th century, but based on the original gables and rear elevation, and the chapel is now used as a barn. An early 18th century brick barn and late 17th century brick garden wall are also on the site.

Notable listed buildings in the conservation area are The Dutch House and Hall Common Farmhouse in Staithe Road, both dating from around 1700. They are built of local red brick with curved 'dutch' gables and Hall Common Farmhouse has a thatched roof. The village centre contains historic buildings dating from the 17th to the 19th century: Church View, The Saddlers Shop and cottage on Norwich Road and 1 – 5 Yarmouth Road are also listed buildings.

In post medieval times, windmills were significant features in the landscape surrounding Ludham village. Most were drainage mills, used to control the level of water in the marshy parts of the parish to allow the grazing of stock which was a mainstay of the local agricultural economy. Ludham became a centre for millwrights working throughout the Broads and many of the iconic drainage mills in the Broads landscape were designed and built by Ludham craftsmen. The England family of millwrights were active in the village from the 18th century. The early mills had cloth sails and the Englands worked closely with William Cubitt, then a millwright in Horning (and later an eminent civil engineer), who invented the shuttered self-regulating sails which enabled taller and more powerful mills to be built. Horning Mill Loke post mill was the first mill to be fitted with the new sails, which were later patented and used on all the mills in Norfolk. Dan England, 1823 to 1897 was the first man in Ludham to generate and use electricity in his millwright workshops and was the inventor of the turbine drum, which would lift half as much water again as the scoop wheel for draining the Norfolk marshes. The last drainage mill built by Dan England was at St Olaves in 1910 for Lord Somerleyton.

Ludham parish had seven drainage mills including two on Horsefen Marshes, two at How Hill and one at Cold Harbour. The derelict brick tower of Womack Water drainage mill is a prominent feature in the landscape, although outside the conservation area. There were also corn mills in the parish, including one at Lovers Lane, which was destroyed in a gale in 1896, and High Mill on Yarmouth Road which was demolished in the early 20th century.

Access to the common lands around Ludham ceased after the Enclosure Acts of the 18th and 19th centuries, when small landholdings were consolidated into larger farms and the land drained by a series of drainage mills with an organised rectilinear drainage pattern. Gradually, instead of being smallholders, the majority of the inhabitants of Ludham became dependant on work as agricultural labourers. The nearby Ludham and Potter Heigham marshes which have remained in grazing use are recognised as one of the richest areas of

traditionally managed grazing marsh and dykes in the Broads, some of which are designated as SSSIs.

In common with many rural communities at this time the village appeared to be largely self sufficient. White's History, Gazetteer and Directory of Norfolk 1883 records 796 inhabitants in 1881 including farmers, agricultural workers, shop keepers, a doctor, school teachers, millwrights, and blacksmiths. It is recorded elsewhere that there were three sites for smithies in the village, but probably not occupied at the same time. Their use ceased with the decline in the use of horses on farms.

Essentially a mixed farming community, twelve farmers were recorded in Ludham in 1888. The farms varied in size and some of the smaller farmers combined agriculture with other activities such as maltster, corn and coal merchant or carpenter. After the First World War Norfolk County Council compulsorily purchased farmland to set up smallholdings to provide work for returning soldiers, and during WWII, part of this land became Ludham Airfield. Although not all in active farming use, several groups of farm buildings remain in the conservation area, notably Beeches Farm, at the junction of Yarmouth Road and Horsefen Road and Hall Common and Manor Farms in Staithe Road.

The relatively remote location of the village and the poor condition of the roads meant that many goods and services for the village travelled by water with trading wherries using the local staithe, which included Staithe Road, Horsefen Road, Ludham Bridge and How Hill. 'Staithe' (from the Old English 'steath' or landing place) provided areas for the transfer of goods from water to land and vice versa, and were focal points for trading in settlements. Public and private staithe appear to have been in existence in some numbers since medieval times - some 83 existing or former staithe have been identified in Norfolk. The Enclosure Awards of 1840 tended to ratify the existing customary landing places or 'public' staithe (i.e. those that have public rights of use and access), stipulating that they were to be used "for the conveyance of corn, manure and other goods to and from the river by owners and occupiers of the Parish."

This means of transport was particularly important for local agricultural businesses with grain, sugar beet, and vegetables for market being common loads, as well as general stores and heavier materials such as chalk, lime, timber, coal and bricks. Other goods included reed, sedge and marsh litter, although trade in the latter declined as horses were replaced by motor vehicles as a means of transport. In the early 1900s, it is noted that goods were unloaded at the wherry harbour at Staithe House in Staithe Road and stored in warehouses for distribution to the surrounding area. The Maltings in Horsefen Road provided storage facilities for Womack Staithe and sugar beet from local farms was transported to the Cantley factory from here until the mid 1950s.

There is evidence of brick making in the parish mainly using locally available materials. Chalk was delivered by river from Thorpe for lime-burning. The remains of a post medieval lime kiln near to Staithe House was surveyed in the 1980s and a brick kiln, probably dating from

the 18th century was found just outside the village south of Yarmouth Road. The brick kilns, next to the Maltings on Horsefen Road were in use until the late 19th century.

A church school was built within Ludham churchyard in 1841. The site is now occupied by the St Catherine's Church Rooms, an early 20th century building in the Arts and Crafts style, designed by Norwich architect, Edward Boardman who lived locally at How Hill House.

A Board School was built on School Road in 1873 to accommodate 140 children. It was enlarged in 1892 for 200 children, and the accommodation upgraded in the mid 20th century.

There were two chapels; a Baptist Chapel, in Staithe Road was built on the site of the Malthouse Lane post mill in 1821 to seat 150 people and demolished in 1975. The field to the south was called 'Meeting House Pightle'. The Methodist Church on Catfield Road survives, designed and built by Mr Chaplin of Ludham in 1866, it is recorded as containing '250 sittings'.

The 20th century

North of Ludham and outside the conservation area, How Hill House is a beautiful listed Arts and Crafts house on an estate of marsh, pasture and farmland bordering the River Ant. Built at the turn of the last century by prominent Norwich architect Edward Boardman, who had strong connections to the village. Initially intended as a country retreat, it was extended during the First World War to become the family's home. How Hill House is now run by the How Hill Trust as an Environmental Education Centre for school children and young people.

Ludham played an active part in World War II. The airfield in the north east of parish, consisting of three tarmac covered runways and ancillary buildings, became operational in 1941, as a satellite for the main fighter station at RAF Coltishall. It was allocated to the USAF three years later, although never used by them, the year after was transferred to the Admiralty and the site closed down in 1946. A number of concrete access roads remain and the control tower and former watch tower are listed buildings, but most of the site has now returned to agricultural use and a small airstrip is still used for private flying. Ludham itself was categorised as a Category 'B' 'defended place' or nodal point, and in 1939, an army camp was built in the village, between Norwich Road and School Road. The Motor Transport Section was in the Manor Grounds (in the conservation area) and a motor vehicle repair shed remains there. The site of the army camp is now the residential area of Laurels Crescent, School Road and Willow Way. Ludham Bridge was identified as a strategic river crossing and was well defended with gun emplacements, anti-tank defences and pill boxes, including the drainage mill north of Ludham Bridge which was converted into a two storey pill box.

In 1954 a film, Conflict of Wings was filmed in Ludham, the story set in a Norfolk country village where the locals decide to fight against a proposal to build a rocket range on a bird sanctuary.

One of the more eccentric features of Ludham in the 1950s and 60s was the Manor Bird Sanctuary in the Ludham Manor gardens. Accessed off Horsefen Road via bridge over a dyke, it was a popular early 'visitor attraction' with a Fairy Garden containing a collection of stone animals, model flowers, toy tea parties, wishing wells and other eccentricities, before the trail led to the tea rooms at the Manor where some exotic birds were kept. Sadly all this is long gone and the former sunken garden is now a lake.

The area has a number of literary and artistic connections, including the artist Edward Seago (1910 – 1974), who for many years lived at The Dutch House in Staithe Road, Ludham.

The most noticeable change to the village is the new housing built in the 20th century. Most of this is on the north and west fringes of the village, including on land that was occupied by the WWII camp. Latchmoor Park and Pikes Nursery (outside the conservation area) were developed later in the century, the latter based on sketch designs by a resident local artist.

The local rivers, Womack Water and the staithe have been a constant influence on the life of the village and there is a long history of boat building and maintenance in the area. The upsurge of tourism in the whole of the Broads area during the latter part of the 19th century and early 20th century, saw Ludham adapt to cater for the visitor trade. In the 1930s Percy Hunter and his two sons established a boatyard, building and hiring cabin yachts on Womack Water. This was the start of the well-known Hunter hire fleet of vintage, wooden, half-deckers (*day boats*) and cruisers. The yard subsequently became an education centre and then a Trust which still hires out boats. The boats and boatyard are much loved reminders of the heyday of boating on the Broads.

By the 1940s the use of wherries on the waterways was in decline, as they were unable to compete with improving links to the surrounding countryside via rail and road. Many wherries were lost and the Norfolk Wherry Trust was set up to preserve part of this great tradition. The Trust purchased the Wherry Albion, initially to be used as a trading vessel and although this proved to be uneconomic, Albion is still a well-known sight on local rivers as it is hired out by the Trust for group trips. In the 1980s, a permanent home for Albion and the Trust was set up at Womack Water with the digging out and building of a new wherry base.

Swallowtail Boatyard also on Womack Water, hires, builds and restores sailing craft and provides chandlery stores to boaters.

In the mid 20th century, improved facilities for visitors were built at Womack Staithe, as the tourist trade increased and it is now a vibrant centre for visiting hire boats.

Road improvements carried out in the mid to late 20th century have had an effect on the character of the village. These include the widening of Norwich Road and the widening and straightening of Yarmouth Road at its junction with the High Street (Bakers Arms Green) and Horsefen Road (Pit Corner).

Spatial and Character Analysis

Landscape character

The land around Ludham has two distinct characters. In the Broads Authority area to the south of the conservation area, Womack Water occupies a minor tributary of the River Thurne, incised through the adjacent upland towards Ludham village. Small to medium scale grazing marshes link to the gently sloping valley sides and a fringe of carr woodland provides a sense of enclosure. Views into the settlement from the south are limited by tree cover around Womack Water, along Horsefen Road and surrounding Ludham Manor.

On the uplands to the north, west and east of the conservation area, the topography is flat with little change in levels and a moderately open character, particularly around the former Ludham air field. This fertile agricultural land is predominantly in arable use with some fields delineated by hedges and some by ditches, which add to the open character of the area. On some minor roads, trees grown up from earlier hedgerows are prominent in the landscape and tree cover in the built up area and on the fringes of the Broads area give a perception of enclosure.

Views into the village are generally restricted by tree and hedgerow cover and surprisingly the church does not play a prominent part in announcing the settlement. The village is most visible from the level more open countryside looking eastward along Norwich Road with glimpses of the church tower possible amongst the trees, but from the east (Yarmouth Road) 20th century development is the first indication of the village. From the south along Staithe Road, the historic farm settlements of Hall Common Farm and Manor Farm are the first indication of the village. From the water individual waterside properties along Womack Water can be seen but the main village is obscured by tree cover.

Overview of streets and development

Character Area 1: The Village Centre

The crossing of the main Norwich to Yarmouth road (A1062) running roughly east to west and two more minor roads, the High Street leading north to Catfield and Staithe Road running south to marshy land beside the River Thurne, form the historic village centre. The majority of the later development of the village is to the north of the crossroads. The buildings around the crossroads are mainly two storeys with the focal point being the churchyard, bounded by a flint and brick wall and the Church of St Catherine, in the south east quartile.

Norwich Road and Yarmouth Road are offset from the crossing point, forming a pronounced 'S' bend in the main road. The resulting space is an irregular shaped 'square'. It is dominated by traffic and at a later date it might be beneficial to consider some form of re-surfacing, not only to slow the pace of vehicles but also to add emphasis to the relationship of the centre of the village to the Church and churchyard which is an important open space in this part of the village.

The roads forming the crossroads have differing characters – Norwich Road provides a fairly straight entrance to the village, somewhat open on the south, but buildings on the north side hug the road with the Public House on the corner providing an end stop before the road turns northwards to the wider thoroughfare of the High Street. The entrance to Staithe Road at Stocks Hill is visually confined by buildings on both sides and that to Yarmouth Road flanked by buildings on the south and the open space of Bakers Arms Green.

Buildings in the western part of Staithe Road and opposite the church on Norwich Road are built hard onto the roadside emphasising the open space of the churchyard. Historically the commercial centre of the village, the majority of the buildings are now in residential use, although there are still a number of shops in this part of the village.

Norwich Road

Approaching Ludham from the west, the first buildings in the conservation area boundary area are a pair of cottages and a villa, dating from the 19th century and rendered under slate roofs. Opposite, on the south of the road, Heronway is a 20th century house designed with reference to the Arts and Crafts style and beyond a view of St Catherine’s Church opens up with a backdrop of trees on Staithe Road.



Heronway is a 20th century house designed with reference to the Arts and Crafts style

The church is impressive and given greater prominence as it is set back from the road within the green space of the churchyard dotted with trees and light coloured gravestones. The brightly painted clock on the north face of the tower is a prominent feature.

Beside the church, the Arts and Crafts Church Rooms is a prominent building, being brought closer to the road than originally planned when the road was widened in the 1960s. On the

opposite side of the road, rows of cottages and detached houses are set back from the road behind gardens, in the case of the Old Vicarage a substantial garden bounded by a 19th century brick wall topped by clay coping stones. Nearer to the centre of the village some of the buildings are built 'end' on to the road, possibly following an earlier street pattern. The Limes, Fern Cottage and Redcott are good examples. Adjacent is Church View, an early 19th century pair of cottages, of an unusual design for the area as the front doors are raised up above a semi-basement with delicate cast iron railings to separate them from the street. A row of thatched and whitewashed cottages opposite the church, date from the 17th century and are listed. Part of them once housed a saddler and then a hardware store, the end part of the row is now the Alfresco Tea Rooms.



The west entrance into the village along Norwich Road

High Street and Catfield Road

The Kings Arms Pub turns the corner from Norwich Road to the High Street, its main facade facing Yarmouth Road is prominent when approaching the village centre from the south. At the start of the High Street the road appears to have a generous width, but this is largely due to former front gardens being absorbed into the space (for example in front of Thrower's shop) and the wide entrance to the pub car park. The streetscape here would benefit from restoring a sense of enclosure by, for example, narrowing the car park entrance to the public house with appropriately designed walls or fences. Trees further down the High Street and in Catfield Road fringe the northwards view.



The King's Arms - streetscape here would benefit from improvement

Buildings at the beginning of the west side of the road are built close to the carriageway, the line markings indicating the former shallow front gardens. The garage forecourt interrupts this enclosure of the street, after which a row of three cottages and West Terrace are again at the side of the road. The scale of the buildings is generally modest, a mixture of two and single storey with the single span garage building built gable end to the road being a prominent building. The building facades are generally colour-washed render with the single storey Wendy House a notable exception being built of local red brick with a hipped pantile roof.

On the east side of the street, a red post box and traditional red telephone box are noticeable beside Thrower's Village Store, which occupies a 19th century red brick building with a pantile roof, possibly a former house or pair of houses. The building, with its 20th century shopfronts, is in a conspicuous position on the crossroads, and soft landscaping against the north wall of the shop extension could soften the carpark entrance. Beyond the Village Stores, a row of one and two storey late 20th century houses are set back behind gardens, the majority enclosed by neatly clipped hedges. The trees in the gardens of The

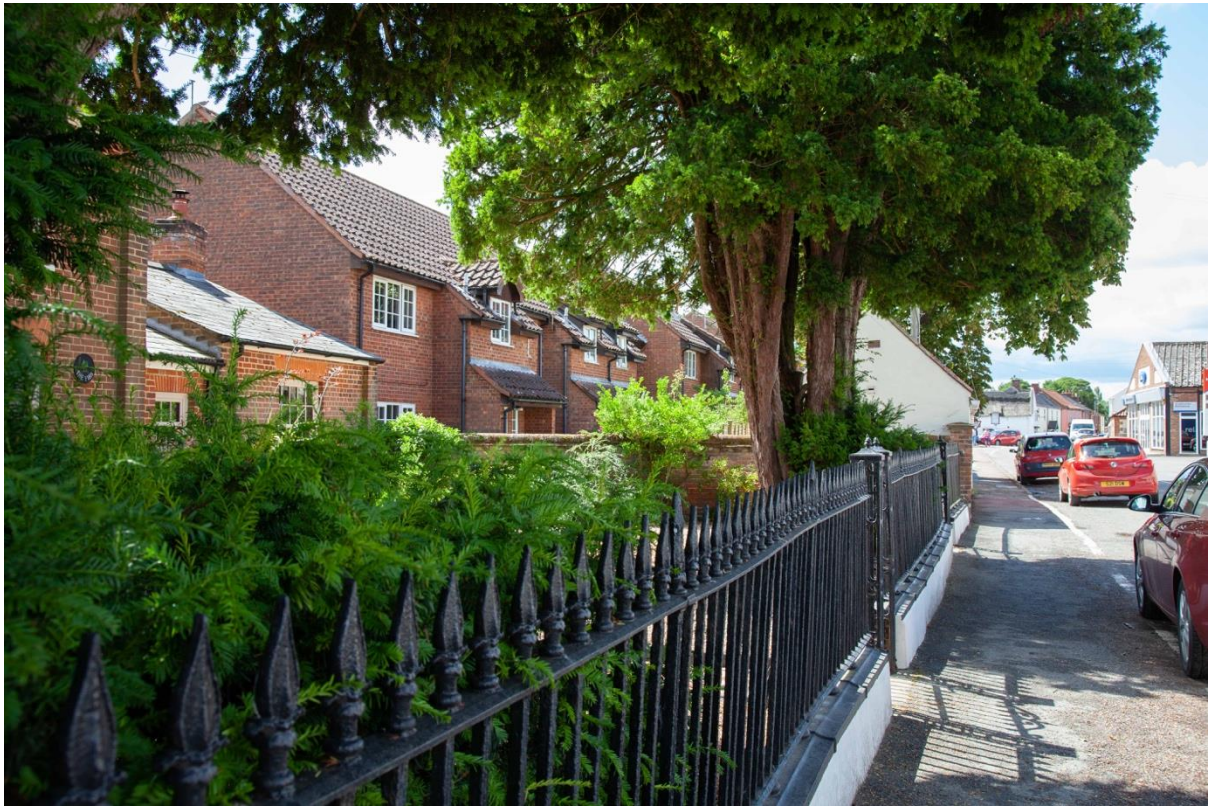
Firs, a well preserved mid-19th century house, make a positive contribution to the street scene as do the high quality railings and gates around the garden.

At the junction with School Road/ Malthouse Lane the road becomes Catfield Road. The early 19th century Albury House on the corner of Malthouse Lane retains many of its original features. Holly House and The Croft are in a similar style and materials of local red brick and clay roof tiles, beyond which is the conservation area boundary. Hedges and trees hint at the countryside to the north.



A red post box and traditional red telephone box are noticeable beside Thrower's Village Store

On the west side of Catfield Road at the junction with School Lane, The Stores is a listed building dating from the early 18th century. It has colour-washed render with a thatched roof and retains examples of the original design of timber gutters. It was known by several names, as Town Farm in the 19th century, The Stores from the early 20th century and is often referred to as Cook's Corner. It is now divided into several dwellings, each with its own name. The mid-19th century Methodist Church is of a different style and materials to any other building in the village. Built gable onto the road, it is faced with fine knapped flint, the door and elegant tall, leaded windows trimmed with red brick. It also has a good set of iron railings with intricate tops. A footway, verge, hedge and trees beside the school play area marks the end of the extension to the conservation area.



The Firs and its high quality railings make a positive contribution to the street scene



Albury House on the corner of Malthouse Lane contributes to the character of the area



The Stores is a listed building dating from the early 18th century



The Methodist Church faced with its fine knapped flintwork

School Road

The School and attached School House were built in the latter part of the 19th century of red brick with stone dressings and fish scale and plain slate roof. The iron entrance gates are

flanked by red brick piers with decorative stone cappings and the front boundary wall is constructed with un-knapped field flints and a hog's back red brick coping. The District Nurses House was built in the mid 20th century shortly after the inception of the National Health Service when free health care was being taken out into the community and in particular to rural areas. These buildings were often of a generic design, usually contained a consulting room and living accommodation for one or two nurses and were often built on a corner 'to be easily found'. Children's health was of a particular concern in this post war period, hence the position of this house adjacent to the School.

The opposite side of School Road is already in the conservation area and includes a 19th century red brick single storey building which was once occupied by a blacksmith's until just after the last war, some villagers still refer to it as being 'The Old Forge'. It has also had a previous use as a farriers shop and currently houses workshops.



19th Century School, 1955 District Nurses House and the Old Forge

Malthouse Lane

At the crossroads with the High Street and School Lane the west part of Malthouse Lane is within the conservation area boundary. A low level thatched cottage is noticeable on the bend of this narrow lane.



A low level thatched cottage is noticeable on the bend of the narrow Malthouse Lane

Yarmouth Road

The entrance to Yarmouth Road from the High Street is flanked by trees on one side and buildings on the other. On the North side, a pleasant green area containing the village sign, seats, a Millennium sculpture and village information board, is given more emphasis by the mature trees behind. Known as Baker's Arms Green, this area was formed when the Baker Arms Public House was demolished to enable the widening of the road in the mid 20th century. Beyond the green, the road is enclosed by the gable of a red brick cottage and Rose Cottage, which is thatched and rendered and dates from the latter part of the 17th century.

The south side of the road is enclosed by a range of thatched houses and former shops built parallel to the road behind a narrow footway. Dating from the mid 18th century, Nos 1 – 5 Yarmouth Road are listed and retain many of their original casement windows. At the end of this row, Manor Whin was another former public house. Beyond, Rose House is differently orientated, being built side onto the road with a prominent asymmetrical gable of local red brick. Extensive tree cover in the grounds of Ludham Manor line the remainder of this side of the road until its junction with Horsefen Road.



Baker's Arms Green: a pleasant area with a backdrop of mature trees



Numbers 1 – 5 on Yarmouth Road are listed

Character Area 2: Horsefen Road

A prominent oak tree at Pitt Corner, marks the entrance to Horsefen Road from Yarmouth Road. The tree is surrounded by a timber seat, The Mardling Seat that replaced an earlier seat of the same name at the entrance to the former Ludham Manor Bird Sanctuary and Fairy Garden. Opposite, a pair of late 20th century houses designed to reflect the local vernacular, sit on a triangular piece of land formed as a result of improvements to the road junction in the mid 20th century.



Above: Entrance to Horsefen Road and modern houses built in a vernacular style; below: the rural character of Horsefen Road



Horsefen Road, leading down to Womack Water, is rural in character and lined with trees along much of its length. The lack of footpaths next to the carriageway adds to its rural feel and the extensive and thickly wooded grounds of Ludham Manor on the west side make an important contribution to the character of the conservation area.

Historically, with easy access to the Staithe, this was a working area and farmsteads (such as Beeches Farmhouse and Barn) cottages and malthouse buildings remain, many of them now converted to dwellings. These use the traditional materials of render or local red brick under thatched or pantiled roofs.



Horsefen Road with its thatched barns

As the road curves eastwards, a view of Womack Water opens up at Womack Staithe in contrast to the earlier enclosure of the road by buildings and trees. This is a popular area and important to the village, with mooring for boats. Used all the year round, but particularly busy and vibrant in the summer months, parking for cars, a pleasant grassed area with trees with seats and small shops provide facilities for visitors by road and water. The shops are housed in a late 20th century building which, whilst constructed of the locally found materials of red brick and flints with a steeply pitched pantile roof, is domestic in appearance. However, the environs might be improved if the car parking areas were resurfaced with a sympathetic material and some carefully positioned landscape improvements included to soften the effect of the number of cars using the area. There are views across Womack Water to the tree lined bank opposite. The public toilets and waste and recycling area are discreetly positioned to the east of The Staithe behind three ivy-covered tree stumps on the road side. These might be better replaced with a continuous low hedge of an indigenous species or sympathetic fencing.



With easy access to the staithe, this was a working area with farmsteads, cottages and malthouse buildings, many of which remain.

After the Staithe, the road continues to curve east and south, roughly following the line of Womack Water. Hedges and individual trees fringe the road with open arable fields to the north giving views to gently rising ground. On the south side of the road, the water largely disappears from view behind first a small boatyard, an informally sited group of timber holiday chalets and then individual houses. These vary in size, from 19th century cottages, such as Fenside and Holland Cottage, which tend to be built close the road, to larger 20th century houses set nearer the water in large gardens. Trees, drainage dykes and boathouses add to the character of this watery landscape. The open gardens of some of the larger properties interrupt the largely rural character of the road.

At the easternmost end of the road, distinctive low wide-span single storey buildings of two boatyards, evidence the continued tradition of boat building in the area. The first one, Swallowtail Boatyard, constructed in the 20th century, is traditional in design and clad in traditional timber boarding. Then, 1980s boatsheds house the Norfolk Wherry Trust, the base for the Wherry Albion, the last trading wherry on the Broads. Adjacent, the buildings of Hunters Yard, are also clad in timber, and are largely as they were built in the 1930s.

Also on that site is a building that was constructed by the Broads Authority in 1993 as a field base for their operations. Its style reflects that of local boatyards, but with an upper level room providing wide views across the Thurne valley and Horsefen marshes. The building was decommissioned by the Broads Authority in 2017. It is now used as a boatyard.

The activities of the boatyards with their mooring basins, the waterside houses and Womack Staithe are more visible from Womack Water than from Horsefen Road. These are all in contrast to the quiet and natural character of the alder carr woodland on the south west bank. The head of Womack Water is at Staithe House in Staithe Road.



Businesses at Womack Stathe provide services to residents and visitors





The character of the easternmost end of Horsefen Road. It's boatyards and activities contribute greatly to this part of the Conservation Area and wider Broads' cultural heritage and landscape

Woodlands (pictured below), a well preserved, detached 19th century cottage of red brick with a pantile roof stands at the end of Horsfen Road. Beside the cottage the road reverts to a track (Marsh Wall) allowing open views across Horse Fen marshes and to Womack Water Drainage Mill.



Character Area 3: Staithe Road and part of Cold Harbour Road

The beginning of Staithe Road at Stocks Hill is enclosed by houses built near the road on both sides. The houses on the west side are of differing sizes and styles, but form an attractive group that includes The Old Post Office, Sunnyside, Manor Gates and The Town House. On the east side, two storey houses form an almost continuous row. Although similar in style they are of a variety of ages, unified by the use of red or colour washed brick with a mixture of red and black pantliles.



The houses at the northern end of Staithe Road are of differing scales and dates, but form an attractive group

After the closely-built buildings of the village centre, Staithe Road is relatively straight and becomes progressively more rural in character as it progresses through level countryside. The extensive wooded area in the grounds of Ludham Manor and the trees around Ludham Staithe in the grounds of Staithe House, restrict views from the road to the east. The Staithe at the head of Womack Water, and the drain feeding into it from the west are not immediately obvious, although they are marked by a low white painted post and rail fence.

The metal finger post (pictured below) showing the profile of a duck and 'crossing' on the opposite side of the road is an attractive and idiosyncratic feature.



Development on the remainder of Staithe Road is domestic in nature, the houses mostly detached, and widely spaced in medium to large gardens. Those built in the 20th century are, for the most part, on the west side of the road, and although enclosed by hedges on the road side have an open feel allowing glimpsed views across the drained landscape and open fields.

The earlier development is mainly to the east, a mixture of farmsteads, former workers cottages and detached houses, the road intermittently bounded by red brick walls or farm buildings and with many trees.



Domestic houses and farmsteads contribute to the character of the area



Some of the earliest buildings in the village include the impressive Dutch House and Hall Common Farmhouse, both listed houses

Some of the earliest buildings in the village are on this road such as The Dutch House, home of the artist Edward Seago, and Hall Common Farmhouse, both of which are listed. They both date from around 1700, and are built of local red brick and curved 'dutch' gables, with Hall Common Farmhouse being thatched. A good red brick wall with a hog's back coping and intricate metal gate separates The Dutch House from the road. Other buildings of note are the 19th century Staithe House and the group of buildings on the corner of Lover's Lane, Manor Farm and St Bennett's Farm and the cottage, The Mowle. Many of the earlier buildings have thatched roofs.

Due to the accessibility to Womack Water, the area gained popularity in the early 20th century, and Holm Mere stands out, not only for its position directly on the roadside, but also for its 'neo-Tudor' style when an earlier small cottage was extended in the 1930's.

Behind the properties on the east side of the road, the area of land between Staithe Road and Womack Water is low lying marshland and alder carr woodland contributing to the character and setting of the settlement.



Beautiful Broads' landscapes can be glimpsed towards the end of Staithe Road as it turns to Cold Harbour Road

Architectural styles and development

There is a range of architectural styles and a variety of materials in the conservation area, largely related to age and location.

Buildings in the village are, on the whole domestic in scale, often of two storeys. Some earlier buildings are of 1½ storeys utilising the roof space for living accommodation, often with rendered walls under steeply pitched roofs thatched in water reed, demonstrating the use of historically locally available materials. The number of buildings retaining their thatched roofs is a feature of the conservation area. Walls of locally produced red brick are found on historic buildings, with clay pantiles being the most common roof finish, slates being confined to a few buildings of the 19th century. It is notable that the early brickwork on some buildings has been either painted or rendered over during 20th century alterations.

A number of houses were built in the village in the 20th century, some more successful at integrating with the character of the village than others. The main differences between earlier buildings in the village and those constructed in the 20th century are their larger scale, as standards of construction and expectations have changed, and their siting in relation to the road due to increased car ownership. Later houses tend to be set back from the road behind parking areas in contrast to the tightly knit streetscape in the earlier part of the village. However, the majority of the 20th century houses are grouped together, away from the historic part of the village, although there is some infill development, which in the main respects the historic building lines.

Boundary treatments, hedges and trees

Property boundaries in the conservation area are treated in a variety of different ways. Houses, cottages and shops often enclose the highway, particularly in the village centre, and elsewhere farm and out buildings are built onto the road such as those at Staithe House, Hall Common Farm and Manor Farm on Staithe Road and the former maltings on Horsefen Road.

Garden walls are important elements in the village, particularly if they have surviving historic decorative brickwork or traditional copings. Almost exclusively in local red brick, examples include those in front of the Old Vicarage in Norwich Road, the School in School Road, and Hall Common Farmhouse and The Dutch House in Staithe Road, the latter with an elaborate metal gate. Later walls can also make a contribution such as the flint and brick churchyard wall and the curved walls to the gate to Ludham Manor on Yarmouth Road.

There are good examples of metal (historically cast or wrought iron) railings, especially in the village centre. Of particular note are those in front of Church View, Norwich Road, the Methodist Church in Catfield Road and The Firs in the High Street which retains two intricately worked gates and unusual gate piers in the same material.

These boundaries on public thoroughfares make a particular contribution to the street scene.

Hedges to gardens are found throughout the conservation area, but are more evident on the rural Staithe Road and Horsefen Roads. These are most successful when indigenous species are used to compliment the local vernacular. In the more agricultural areas of the settlement, field hedges enclose the road, often emphasised by individual trees that have grown up from earlier hedgerows. This is most noticeable on Horsefen Road and Staithe Road.

Trees make a great contribution to the character of the conservation area, both individually and in groups. Naturally there are fewer trees in the closely knit village centre than in other areas, but trees on the fringes of the village give a backdrop to views and vistas out of the centre. Important groups of trees include those along Yarmouth Road, Horsefen Road, Staithe Road, in the grounds around Ludham Manor and the alder carr woodland on the east side of Womack Water.

Open spaces and public realm

The principal public open space in the village is the Churchyard. This large grassed space punctuated by gravestones, memorials and both deciduous and evergreen trees, is important in providing a setting for St Catherine's Church.

The churchyard sits at the south west corner of the meeting of the roads in the village centre. As mentioned earlier in this document, changes in surface treatments and some highway re-alignment could make this area a more attractive focus for the village centre. The ad hoc parking arrangements at present can mean that this area feels rather dominated by cars.

The other major open space is the area adjacent to Womack Staithe. The grassed area with trees and picnic facilities provides an appropriate 'edge' to Womack Water successfully integrating a number of car parking spaces. Whilst performing a slightly different function, the area of parking in front of the shops could benefit from a redesign to soften the effect of the number of vehicles using the area. To improve visitor and local knowledge of the staithe and the facilities and services available, the site would benefit from an appropriately designed directional sign positioned at the top of Horsefen Road.

Two smaller green areas, Bakers Arms Green on Yarmouth Road and Pit Corner on Horsefen Road were formed after the roads were widened and realigned. They both make a contribution to the character of this part of the conservation area.

Generally there are no footways adjacent to the highway in the village. This is a noticeable feature which greatly contributes to the rural character of the village. There are some footways in the settlement, but these tend to be adjacent to 20th century development or as a result of highway improvements.

Issues, pressures and opportunities for enhancements

Generally the buildings and gardens in the conservation area are well maintained and there are no structures that would qualify to be on the Buildings at Risk Register.

The special character of conservation areas can easily be eroded by seemingly minor, and well intentioned home improvements such as the insertion of replacement windows and doors with ones of an inappropriate design or material, (for example hinged opening lights in lieu of sash windows and UPVC instead of painted timber). There is evidence of this in Ludham conservation area. This can be a particular issue with unlisted buildings that have been identified as contributing to the character of the Conservation Area. In line with current legislation, all complete window replacements are required to achieve minimum insulation values, but recognising the affect that inappropriate replacements can have, Local Authorities can relax that requirement when considering the restoration or conversion of certain buildings within conservation areas, and advice should be sought from the Local Authority at an early stage.

Boundaries on public thoroughfares make a particular contribution to the street scene and Ludham has many good examples of railings and brick walls. Close boarded fencing is often used and this can be successful if sensitively designed, but can depend on its height and position and concrete posts and concrete gravel boards should be avoided. The loss of front garden boundaries to provide off-street parking can also erode the special character of streets.

National and local planning policies aim to protect the character of conservation areas through limiting or controlling future development. The character of the area could easily be eroded by loss of open space and the construction of properties that are out of scale with the existing.

The character of the riverside can be diminished by the replacement of the natural bank edge and vegetation with quay heading. This can lead to the urbanisation of the river and building owners with water frontage properties should consider this when planning work to the river bank.

Management and Enhancement Proposals

- Consider changes in road surface materials at the crossroads in the village centre to improve aesthetics and consider new surface treatments to better define the public realm.
- Consider measures for parking rationalisation so the crossroads do not feel car dominated
- Consider narrowing the King's Arms car park entrance to increase the sense of enclosure to the High Street
- Consider planting to north wall of the village Stores shop extension to soften the car park entrance, making sure that there is no obstruction to access and parking. Climbers growing up the side of the extension may be the most appropriate form of planting

- Consider carefully positioned landscape improvements to soften the parking in front of the shops at Womack Staithe
- Consider an appropriately designed directional sign at the top of Horsefen Road making people aware of the existence of Womack Staithe and the facilities and services available

Changes to the conservation area boundary

This re-appraisal includes the following amendments to the original conservation area boundary (see Appendix 5).

Proposed Amendment to Boundary	Reasons
A. North Norfolk DC area School Road/Catfield Road	Include School, school ground and the former District Nurses' house as important to the social development and the history of the village
B. North Norfolk DC area Latchmoor Park	Exclude as 20 th century development of insufficient historic interest for the conservation area
C. North Norfolk DC area East of Horsefen Road	Addition of Woodlands cottage at the end of Horsefen Road
D. Broads Authority area Field to the east of Staithe Road/Cold Harbour Road	Exclude most of this farmland as it is not directly related to the historic development of the village. Retain a strip in the conservation area between the buildings along the street frontage as this 'gap' site is characteristic of the more sporadic nature of development in this part of the village.
E. Broads Authority area St Benet's cottage	Include St Benet's cottage as part of the historic development of the village.
F. North Norfolk DC area Fields to south and north of Lover's Lane and south of Norwich Road	Exclude as farmland not directly related to the historic development of the village

Public Consultation

Consultation with interested parties and organisations was carried out. A joint consultation exercise was undertaken with North Norfolk District Council as the proposed conservation area boundaries include land in both planning authority areas as defined on the maps included in the character appraisals. A leaflet was delivered to all residents and businesses within the conservation area boundary and within proposed amended areas, site notices were erected, advertisements placed in the Parish Newsletter, and copies of the appraisal documents were made available both online and in hard copy format in the Broads Authority offices. The leaflet included a comments section and consultees were also able to comment online and via email. Officers were available to answer queries by telephone, letter or e-mail.

A public exhibition was due to be held on Saturday 21 March 2020, at the St Catherine's Church Rooms, Ludham. Unfortunately the public exhibition was cancelled due to the government restrictions imposed surrounding Covid-19.

The document and consultation responses were presented on the 26th June 2020 to the Broads Authority's Heritage Asset Review Group (HARG) who were supportive of it.

Sources and references

Whites Directory 1845, 1854 & 1883

Kelly's Directory of Cambridgeshire, Norfolk and Suffolk 1883

Understanding Place – Historic Area Assessments Historic, Historic England 2017

Heritage Counts. Historic England 2018

Historic England Advice Note 1 (Conservation area appraisal, designation and management) 2019

National Planning Policy Framework. Ministry of Communities, Housing and Local Government

The Buildings of England, Norfolk 1: Norwich and North-East, Nikolaus Pevsner

The Norfolk Broads, A Landscape History, Tom Williamson and Bill Wilson

The Norfolk We Live In, Various. 1975

Norwich and its Region, Various. 1961

Landscape Character Assessment, North Norfolk, 2009

Broads Landscape Character Assessment, 2006

www.norfolk Mills.co.uk

Norfolk Historic Environment Record

Appendix 1: Listed buildings (grade II unless stated otherwise)

Broads Authority Executive area

- Hall Common Farmhouse, Staithe Road
- The Dutch House, Staithe Road
- 1 – 5 Yarmouth Road

North Norfolk District Council area

- Saddlers Shop with Cottage adjoining to the west, Norwich Road
- Church View, Norwich Road
- Church of St Catherine (Grade I), Norwich Road
- F.H. Chambers memorial, approx. 50 m SW of south porch of Church of St Catherine, Norwich Road
- Ludham War Memorial Cross
- The Stores, High Street/Catfield Road

Appendix 2: Unlisted buildings that make a positive contribution to the character of Ludham conservation area

Whilst the following buildings, boundary walls and railings within the present and proposed conservation area do not merit full statutory protection, they are considered to be of local architectural or historic interest, and every effort should be made to maintain their contribution to the character of the conservation area.

Broads Authority Executive area Yarmouth Road (south side)

- Rose House
- Former Motor Repair Shed in grounds of Ludham Manor

Stocks Hill/Staithe Road (east side)

- Crown House and outbuildings behind
- Butchers Shop (1 High Street) and outbuildings behind

- 1 – 5 Stocks Hill/Staithe Road
- Ludham Manor, outbuildings and WWII vehicle repair shed
- Staithe House, outbuildings and boundary walls
- Flint and Brick wall in grounds of Staithe House
- Barn Owl Cottage
- Holm Mere
- The Mowle & metal gates

Cold Harbour Road

- Hall Common Cottage
- St Benet's and thatched garden building

Horsefen Road (west side)

- Womack House and outbuildings
- Fenside and outbuildings
- Boatsheds at Hunters Yard
- Boatsheds at Norfolk Wherry Trust Base

North Norfolk District Council area

(Note: these to be confirmed in accordance with the criteria for locally listed buildings in the North Norfolk District Council area).

Norwich Road

- 1 & 2 Oulton Cottages
- Lankaster
- 1 – 4 Alma Cottages
- Stone House/Cottage
- The Old Vicarage
- Brick garden wall to The Old Vicarage
- The Limes
- Fern Cottage

- Redcott
- 1 & 2 Church View
- Flint wall to rear of Kings Arms PH
- St Catherine's Church Rooms (former National School)
- Flint & brick churchyard wall to St Catherine's Church

High Street (west side)

- The Kings Arms Public House
- Flowers by Kim
- The Wendy House
- Ray House, Luxem Cottage & Vale Cottage
- 1 – 5 West Terrace
- Hollymoore Cottage

Catfield Road

- Ludham Methodist Church
- Albury House
- Folly House

High St (east side)

- K6 telephone box & post box
- Throwers, 2 High St (2 storey bldg on corner)
- Cats Whiskers Hair Salon
- The Firs & garden railings
- School Road
- Ludham School
- 5 School Road (Former District Nurses House)
- 12 School Road workshop

Malthouse Lane

- Sunnydene

- Ashleigh
- Garden Cottage

Stocks Hill/Staithe Road (west side)

- The Old Post Office
- Sunnyside & railings
- Manor Gates, adjoining buildings and lychgate
- Manor Croft
- Town House
- 1 & 2 Rice Cottages
- 'Duck Crossing' sign
- The White House
- The Lodge
- Manor Farm
- St Benet's Barn

Horsefen Road (east side)

- The Beeches
- The Stables, The Hayloft and Beeches Farm Barns
- Womack Lodge
- 1 – 3 Womack Cottages
- Womack Residences (former maltings)
- 'Ducks Crossing' sign
- Seven Oaks
- Green Corner
- Woodlands

Appendix 3: Planning documents, policies and associated guidance

Local Plan for the Broads (Adopted 2019):

- Policy SP5: Historic Environment
- Policy DM11: Heritage Assets
- Policy DM12: Re-use of Historic Buildings
- Policy DM43: Design
- Policy DM48: Conversion of Buildings
- Policy SSMills: Drainage Mills
- Broads Authority Supporting Documents: The Landscape Character Assessment (Updated 2016)
- The Landscape Sensitivity Study for renewables and infrastructure (adopted 2012)
- Strategic Flood Risk Assessments
- Broads Authority Flood Risk SPD
- Biodiversity Enhancements Guide
- Landscape Strategy Guide
- Mooring Design Guide
- Riverbank Stabilisation Guide
- Waterside Bungalows and Chalets Guide
- Sustainability Guide
- Planning Agents information booklet
- Keeping the Broads Special
- Building at the Waterside

The North Norfolk Local Development Framework: Core Strategy and Development Management Policies (adopted 2008):

- Policy EN 8: Protecting and Enhancing the Historic Environment
- Policy EN 2: Protection and Enhancement of Landscape and Settlement Character

- Policy EN 4: Design
- Policy EC2: The Re-use of buildings in the countryside

North Norfolk District Council Supporting Documents:

- North Norfolk Design Guide (adopted 2008)
- North Norfolk Landscape Character Assessment (adopted 2009)

Please note: North Norfolk District Council are currently re-viewing all of the above documents. Local planning policies, supporting documents and guidance are updated periodically, whilst this policy and document list was relevant at the time of the writing of the report please check with the relevant Authority for updates.

Appendix 4: Contact details and further information

Broads Authority

Address: The Broads Authority, Yare House, 62 – 64 Thorpe Road, Norwich NR1 1RY

Telephone: 01603 610734

Website: www.broads-authority.gov.uk

North Norfolk District Council

Address: Council Offices, Holt Road, Cromer, Norfolk NR27 9EN

Website: www.north-norfolk.gov.uk

Norfolk Historic Environment Service

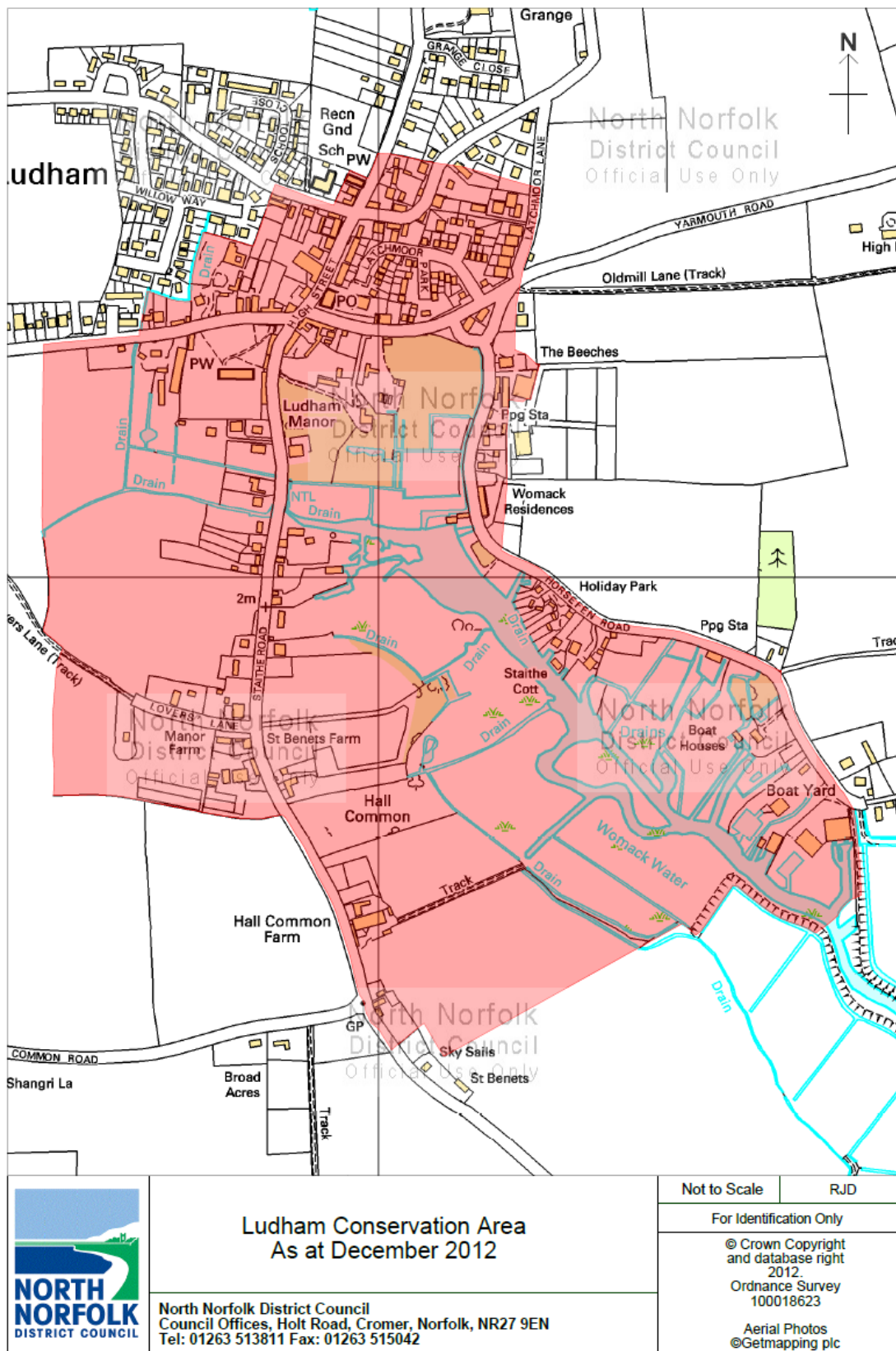
Address: Union House, Gressenhall, Dereham, Norfolk NR20 4DR

Tel: 01362 869280

Website: www.heritage.norfolk.gov.uk

Appendix 5: Original and new conservation area boundary

Original boundary

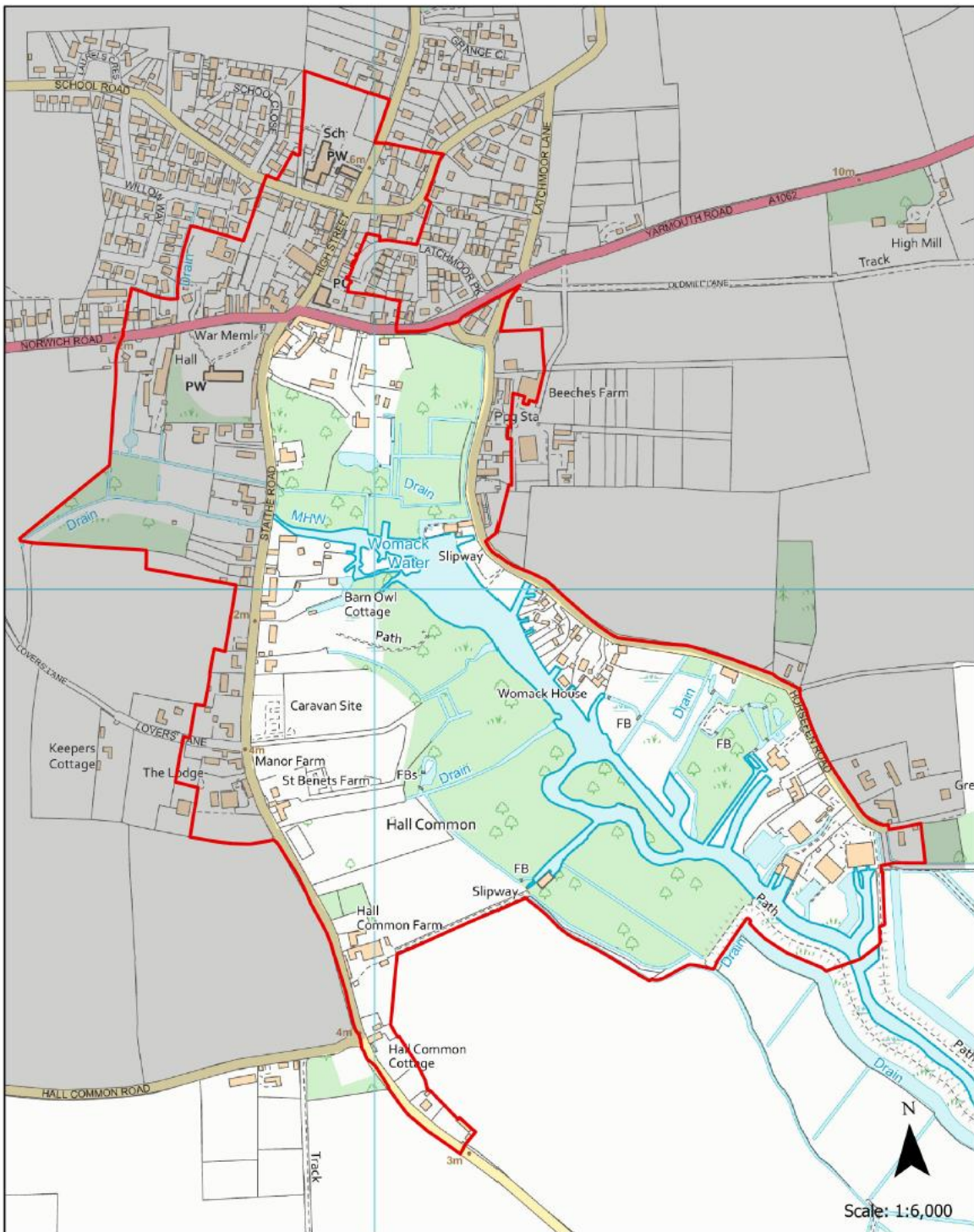


New boundary

Ludham conservation area (North Norfolk)

Last appraised: 2020

- Outside broads area
- Conservation area



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