

Planning Policy & Built Heritage Working Party



Please contact: Linda Yarham

Please email: linda.yarham@north-norfolk.gov.uk

Please Direct Dial on: 01263 516019

Friday, 4 December 2020

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held remotely via Zoom on **Monday, 14 December 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 N Dixon, Mr P Fisher, Ms V Gay, Mr P Heinrich, Mr N Pearce, Mr J Punchard, Dr C Stockton and Mr J Toye

Substitutes: Mrs A Fitch-Tillett, Mrs W Fredericks and 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

Chief Executive: Steve Blatch
Tel 01263 513811 **Fax** 01263 515042 **Minicom** 01263 516005
Email districtcouncil@north-norfolk.gov.uk **Web site** www.north-norfolk.gov.uk

A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

(Pages 1 - 8)

To approve as a correct record the Minutes of a meeting of the Working Party held on 9 November 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. LANDSCAPE CHARACTER ASSESSMENT AND LANDSCAPE SENSITIVITY ASSESSMENT SUPPLEMENTARY PLANNING GUIDANCE

(Pages 9 - 32)

Summary:

This report considers the representations made at Regulation 12 and 13 stage of Supplementary Planning Guidance preparation and seeks agreement to adopt the final documents as updated guidance to inform the preparation of the Local Plan and for use as material considerations in the preparation and determination of planning proposals in North Norfolk.

Recommendations:

1.It is recommended that Members endorse the revised 2021 Landscape Character Assessment and Landscape Sensitivity Assessments as Supplementary Planning Guidance, SPD's and recommend to Cabinet for adoption and publication

2. That the existing 2009 North Norfolk Landscape Character Assessment is revoked in line with the legislative requirements.

3. That delegated authority is given to Head of Planning in relation to the statutory process required.

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 Cathy Batchelar Landscape Officer, 01263 516155 Cathy.batchelar@north-norfolk.gov.uk	

8. RECREATION AVOIDANCE MITIGATION STRATEGY

(Pages 33 - 70)

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final in principle policy approach in addressing the impacts of growth through the adoption of a Green Infrastructure and Recreational Avoidance and Mitigation Strategy.

Recommendations:

- 1) It is recommended that Members endorse the approach, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated tariff and Policy to be included in the Local Plan to the Planning Manager.**
- 2) In relation to the collection of the tariff it is recommend that Members endorse and recommend to Cabinet Option 1**

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 Kerys Witton: Landscape officer, 01263 516323 kerys.witton@north-norfolk.gov.uk	

9. LOCAL PLAN DRAFT POLICY APPROACHES TO THE ENVIRONMENT

(Pages 71 - 164)

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse a number of policy approaches concerning the natural and built environment.

Recommendations: **It is recommended that Members endorse the revised Policies below, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager:**
ENV 1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads;
ENV 2: Protection & Enhancement of Landscape & Settlement Character;
ENV4: Biodiversity & Geology;
ENV 5: Green Infrastructure & Public Rights of Way;
ENV 6: Trees, Hedgerows & Development;
ENV 9: High Quality Design;
ENV 10: Protection of Amenity;
ENV 11: Protecting and Enhancing the Historic Environment;

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 Caroline Dodden, Senior Planning Officer, 01263 516310 Caroline.dodden@north-norfolk.gov.uk James Mann Senior planning Officer, 01263 516404 James.mann@north-norfolk.gov.uk	

10. LOCAL PLAN - PROGRESS UPDATE ON SITE SELECTION OPTIONS - DEFERRED SITES

(Pages 165 - 172)

Summary: This report provides an update on sites which were previously considered for allocation and which were deferred for a variety of reasons.

Recommendations: **1 That the following sites be retained as allocations in the proposed Submission Local Plan:**

- **Mundesley MUN03/A - Land off Cromer Road & Church Lane**

- **Blakeney BLA04/A Land East of Langham Road**

2 The final policy wording is delegated to the Planning Policy Manager

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Mark Ashwell, Planning Policy Manager, 01263 516325, mark.ashwell@north-norfolk.gov.uk</p>	

11. LOCAL PLAN SITE ALLOCATIONS: NORTH WALSHAM

(Pages 173 - 270)

Summary: To identify the final suite of allocations for North Walsham ahead of Regulation 19 Consultation and subsequent submission.

Recommendations: **1. It is recommended that Members endorse the identified sites for inclusion in the Local Plan.**

2. The final policy wording is delegated to the Planning Policy Manager.

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officers, telephone number and email:</p> <p>Mark Ashwell, Planning Policy Manager, 01263 516325, mark.ashwell@north-norfolk.gov.uk</p> <p>Stuart Harrison, Senior Planning officer 01263 516308, stuart.harrison@north-norfolk.gov.uk</p>	

12. BROWNFIELD LAND REGISTER UPDATE

(Pages 271 - 286)

Summary: This report provides an update to the Brownfield Land Register 2020.

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

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

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

14. 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.”

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

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

PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 9 November 2020 remotely via Zoom at 10.00 am

Committee Mr A Brown (Chairman) Mrs P Grove-Jones (Vice-Chairman)
Members Present: Mr T Adams Mr N Dixon
Mr P Fisher Ms V Gay
Mr P Heinrich Mr N Pearce
Mr J Toye

Mrs A Fitch-Tillett (substitute for Councillor J Punchard)

Members also attending: Mr H Blathwayt
Mr V FitzPatrick
Mrs W Fredericks
Mr R Kershaw
Mr J Rest
Miss L Shires
Mrs L Withington

Officers in Attendance: Planning Policy Manager, Planning Policy Team Leader, Senior Planning Officer, Conservation & Design Team Leader, Democratic Services Manager and Democratic Services & Governance Officer (Regulatory), Historic Environment Manager (Broads Authority)

42 APOLOGIES FOR ABSENCE

An apology for absence was received from Councillor J Punchard. There was one substitute Member in attendance.

43 PUBLIC QUESTIONS

None.

44 MINUTES

The Minutes of a meeting of the Working Party held on 12 October 2020 were approved as a correct record.

45 ITEMS OF URGENT BUSINESS

None.

46 DECLARATIONS OF INTEREST

None.

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

None.

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

The Planning Policy Team Leader presented a report relating to draft policies ECN4: Retail and Town Centre Development, and ECN5: Signage and Shopfronts, 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.

The Chairman asked if it was feasible to extend the Primary Shopping Area (PSA) boundary for Sheringham northwards to include both sides of the High Street, as requested by Sheringham Town Council.

The Planning Policy Team Leader explained that the area in question did not meet the definition of a PSA in national guidance as A1 retail was not concentrated in that area. However, it was part of the town centre, which meant that retail uses were not precluded per se but it was necessary to first consider areas where there were higher concentrations of A1 use.

Councillor Mrs L Withington stated that there was a growing demand for retail and other types of businesses on the seafront at Sheringham and asked if the policies would be sufficiently flexible to allow them to happen.

The Planning Policy Team Leader explained that the policy was in line with the sequential approach in national policy, and there was a framework in place which could allow such development to happen provided the applicant could demonstrate that the policy requirements could be satisfied.

Councillor J Rest stated that Fakenham had public transport links but it was misleading to say they were good. There was no direct bus link to the Norfolk and Norwich University Hospital and it was not possible to get to other parts of North Norfolk without changing buses.

The Planning Policy Team Leader explained that whilst he had referred to good transport links in his presentation, this was in the context that Fakenham was a higher order centre, with bus routes and services that other places did not have. Higher order centres were places where retail and residential development was concentrated, and the concentration of growth in larger town centres provided a better momentum of growth to improve services.

Councillor P Heinrich stated that he welcomed Policy ECN4 but there was an issue in respect of the future viability of town centres, and retail in particular, following the pandemic with the very fast move to online shopping. Most of the town centre shops in North Walsham were very small. They would not be viable for larger retailers and also possibly not for cafes and other leisure orientated uses. Additional retail would be required when the western extension was developed. He asked if it was a certainty that sufficient land could be allocated for more modern, larger retail units and if the Vicarage Street car park would be protected for future retail development.

The Planning Policy Team Leader referred to the retail study which indicated that North Walsham had the largest amount of expenditure capacity to support new retail development. Part of the policy aimed to retain that expenditure and the need for town centre improvements was already recognised by the Council. The development brief for the western extension would look at suitable employment

locations and outline the areas where future development could take place to satisfy the demand. This would come back to the Working Party as part of the land assembly for the western extension.

Councillor Heinrich considered that there was a need to address the problem of untidy shopfronts and inappropriate signage as soon as possible.

Councillor Ms V Gay wished to place on record that the process had been a co-operative one that had involved all North Walsham Members. She welcomed the reference to wider public benefit and public art in Policy ECN4. She stated that shopfronts and signage had a cumulative impact, and the Market Place was a Conservation Area. She welcomed the strengthening of the wording in the policies.

Councillor N Dixon asked if there were enough forward-looking policy provisions to reflect changing shopping trends, the needs of commerce and retention of historic character.

The Planning Policy Team Leader stated that there was a number of policies in the Local Plan that covered these issues, including historic environment policies which would be considered by the Working Party at a future meeting, and the policy approach to town centres which sought to demonstrate the impact of proposals on town centres. He considered that the proposed policies set a good framework to move forward. The Government was also bringing in changes to national policy that would increase the flexibility to allow changes of use of premises in town centres to happen without the need for planning permission.

Councillor Mrs P Grove-Jones referred to the fluidity of premises in Stalham High Street and stated that there had been some growth outside the PSA. She expressed concern that the change to permitted development rights would not control how many businesses of the same type could set up in an area. She was pleased to see the policy regarding signage.

Councillor J Toye asked if businesses that were able to change under permitted development rights would still be required to comply with Policy ECN5.

The Planning Policy Manager confirmed that planning permission, and possibly Listed Building consent, would be required for replacement shopfronts. Advertisements were covered by Advertisement Control Regulations where the considerations related to visual appearance and highway safety. However, these Regulations included quite extensive permitted development rights for non-illuminated fascia signs and small projecting signs, even within Conservation Areas. There was a need to be mindful that there were many developments which were outside the control of the Planning Authority and the policies could not be applied where planning permission was not required.

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

RECOMMENDED unanimously

That Cabinet endorses the revised Policies ECN4: Retail and Town Centre Development and ECN5: Signage and Shopfronts, and delegates responsibility for drafting such an approach, including that of finalising the associated policies and policies mapping, to the Planning Policy Manager.

49 LOCAL PLAN DRAFT POLICIES ECN1: EMPLOYMENT LAND; ECN2: EMPLOYMENT AREAS, ENTERPRISE ZONES & FORMER AIRBASES POLICY; AND ECN 3: EMPLOYMENT DEVELOPMENT OUTSIDE OF EMPLOYMENT AREAS

The Senior Planning Officer presented a report relating to draft policies ECN1: Employment Land, ECN2: Employment Areas, Enterprise Zones & Former Airbases and ECN3: Employment Development outside of Employment Areas, which summarised the feedback received in response to the Regulation 18 public consultation and the Officer responses. He explained that he had made some changes to the ECN1 draft policy since the publication of the agenda in respect of the quantum of land protected for employment and stated that there could be further changes as a result of a further ongoing piece of work on Employment Area boundaries, which was previously agreed by this working party. The use classes quoted in Policy ECN2 would be amended to be consistent with the latest Use Classes Order. He recommended that Cabinet endorse the policy approaches as set out in the report.

Councillor N Dixon asked if there was enough choice of employment land sites to meet the differing needs of businesses. He referred to difficulties experienced by a business in finding a suitable site in Hoveton which could have resulted in the loss of economic activity from the area. He asked how such problems could be overcome.

The Senior Planning Officer explained that there had been quite substantial changes to the policies from the Core Strategy. The amount of employment land proposed (62.4 ha.) was substantially greater than that recommended in the Growth Sites Delivery Strategy Study so the amount proposed would allow flexibility and choice across the District over the Plan period. Policy ECN3 allowed for employment growth outside the designated Employment Areas, which would provide flexibility for the changing nature of the market. The first part of the Study looked at the market and what was happening in the District. The second part was a delivery strategy that would look at specific sites and how they could be brought forward. The Study would be brought to the Working Party in due course.

Councillor Dixon expressed concern that there were no new land allocations in Hoveton. He stated that it was often the case that a landowner might not be willing to negotiate an acceptable arrangement with a business. Some businesses that would have located to the District had been lost due to the lack of suitable employment land. He was not satisfied that enough land had been allocated in the right places to meet future needs, and stated that it was one thing to allocate land but quite another to ensure that it could be delivered when required.

The Senior Planning Officer explained that land could only be allocated if it had been put forward for particular uses. The strategic needs of the District had been considered and the policies were trying to protect existing employment land and make suitable employment allocations where land was available. The latest evidence indicated that there would be enough choice and flexibility in each part of the District. If a business could demonstrate that allocated land was not available, Policy ECN3 would allow it to look outside the designated area. The policies would allow for flexibility bearing in mind that the employment market was likely to change in the short to medium term. They would provide flexibility to allow employment outside the designated areas whilst designating employment areas in the most sustainable areas where land had been put forward.

The Planning Policy Manager reiterated that Policy ECN3 would allow the flexibility

that Councillor Dixon was arguing for. The new policies had moved to a more permissive approach to employment generating proposals which were not on employment land, and had deliberately addressed the problem in Hoveton and Cromer where employment land was at a premium. He did not advise allocating a large number of employment sites all over the District, which would require a further call for sites and constrain employment opportunities to designated sites. On large mixed use allocations in Holt, North Walsham and Fakenham there was a mechanism to link delivery of employment land in a phased way alongside residential development. Land would be made available on good commercial terms in locations where it was more likely to be taken up.

Councillor Dixon stated that he did not wish to see land allocated randomly around the District, but considered that the Council should be pressing for more mixed allocations to produce land where it was needed and where mixed schemes were more likely to be delivered. He sought assurance that there would be greater flexibility and use of that mechanism in the future.

The Chairman stated that the Senior Planning Officer had demonstrated that there was flexibility in ECN3 and that the matter had been addressed.

Councillor P Heinrich stated that he was satisfied that there would be sufficient employment land as part of the mixed use proposals for the western side of North Walsham, which was greatly needed. He asked if sufficient consideration had been given to attracting footloose industries that would appreciate the environment, particularly small scale workshops, studio space, flexible office space and shared workspaces, and if the policies would enable it to happen.

The Senior Planning Officer stated that this issue had been discussed with the consultants that had undertaken the study, and they were satisfied that there would be enough flexibility to allow such uses to come forward.

The Planning Policy Manager explained that the policies under discussion were largely focused on industrial estate type development. Other services were accommodated in supporting economic development policies that would allow for the type of development referred to by Councillor Heinrich.

Councillor Mrs L Withington requested clarification as to the status of the Kingsland site at Sheringham. The Planning Policy Manager stated that he understood the land would remain as employment land but he would confirm directly to Councillor Mrs Withington following the meeting.

Councillor Mrs P Grove-Jones stated that there were a number of large industrial sites around Stalham that were starting to come forward through the planning process, whereas development of workshops on the mixed use sites in the town had not taken place as people were not prepared or able to build the units.

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

RECOMMENDED by 8 votes to 0 with 2 abstentions

That Cabinet endorses the revised Policies ECN1: Employment Land, ECN2: Employment Areas, Enterprise Zones & Former Airbases, and ECN 3: Employment Development Outside of Employment Areas, and delegates responsibility for drafting such an approach, including that of finalising the

associated policies and policies mapping, to the Planning Policy Manager.

50 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

The Senior Planning Officer presented a report relating to 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, which summarised the feedback received in response to the Regulation 18 public consultation and the Officer responses. He recommended that Cabinet endorse the policy approaches as set out in the report.

Councillor Mrs A Fitch-Tillett stated that she welcomed the flexibility in coastal risk areas and the protection and enhancement of the landscape.

Councillor Ms V Gay praised the added support for biodiversity gains in ECN6 and ECN8. She referred to the failure of the country to meet the UN biodiversity targets.

Councillor H Blathwayt expressed concern in respect of the apparent lack of control over some types of caravan sites.

Councillor P Heinrich stated that certificated sites were restricted to 5 caravans. However, he had concerns regarding larger, formal caravan sites, particularly with regard to highway issues.

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

RECOMMENDED by 8 votes to 0 with 2 abstentions

That Cabinet endorses the revised 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, and delegates responsibility for drafting such an approach, including that of finalising the associated policies and policies mapping, to the Planning Policy Manager.

51 LUDHAM AND STALHAM STAITHE CONSERVATION AREA APPRAISALS AND MANAGEMENT PLANS 2020

The Broads Authority Historic Environment Manager presented the report. She stated that the Conservation Area Appraisals had already been approved by the Broads Authority and recommended that both documents be recommended for adoption by the North Norfolk District Council Cabinet.

Councillor Mrs P Grove-Jones referred to the improvement works that had already been carried out at Stalham Staithe and expressed appreciation for the help given by the Broads Authority. She stated that some of the buildings were within the

jurisdiction of the District Council and some within the Broads Authority, which caused problems.

Councillor H Blathwayt, as NNDC representative on the Broads Authority and Heritage Asset Review Group, commended the documents to the Working Party. He thanked the officers of the Broads Authority for their work and inclusive approach to the Ludham appraisal and stated that Councillor Varley, local Member for Ludham, had expressed his support.

The Democratic Services Manager shared Councillor Varley's comments on the Zoom chat facility. In summary, the Chairman stated that Councillor Varley was very supportive of the appraisal for Ludham and appreciated the efforts of the team and the Broads Authority for putting it together in difficult circumstances. Councillor Varley supported the removal of Latchmoor Park as a farmland area and was pleased that the school and district nurse's home had been included. The appraisal brought clarity to the management of the trees as they were in a protected area. Councillor Varley had been impressed by the quality of the work done in bringing the appraisal to the Working Party.

Councillor N Dixon stated that as County Councillor he could confirm that this had been an excellent example of joint working by Stalham Town Council, the Broads Authority and Norfolk County Council in addressing what had been a distressing and enduring problem at Stalham Staithe, and he thanked all parties that had been involved.

Councillor Mrs Grove-Jones endorsed Councillor Dixon's comments and also extended thanks to the NNDC Conservation and Design Team Leader and his team.

It was proposed by Councillor Mrs P Grove-Jones, seconded by Councillor N Dixon and

RECOMMENDED unanimously

That Cabinet adopts the Ludham and Stalham Staithe Conservation Area Appraisals and Management Plans 2020.

The meeting ended at 11.58 am.

Chairman

This page is intentionally left blank

Landscape Character Assessment and Landscape Sensitivity Assessment Supplementary Planning Guidance

Summary: This report considers the representations made at Regulation 12 and 13 stage of Supplementary Planning Guidance preparation and seeks agreement to adopt the final documents as updated guidance to inform the preparation of the Local Plan and for use as material considerations in the preparation and determination of planning proposals in North Norfolk.

Recommendations:

- 1. It is recommended that Members endorse the revised 2021 Landscape Character Assessment and Landscape Sensitivity Assessments as Supplementary Planning Guidance, SPD's and recommend to Cabinet for adoption and publication**
- 2. That the existing 2009 North Norfolk Landscape Character Assessment is revoked in line with the legislative requirements.**
- 3. That delegated authority is given to Head of Planning in relation to the statutory process required.**

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 Cathy Batchelar Landscape Officer, 01263 516155 Cathy.batchelar@north-norfolk.gov.uk	

1. Introduction

1.1 The Council commissioned Land Use Consultants, LUC in February 2018 to review and update the existing landscape character evidence base in line with current best practice, and to produce an updated Landscape Character Assessment and a Landscape Sensitivity Assessment for different forms of renewable energy and other large scale industrial development . They are intended to provide context for policies and proposals within the emerging Local Plan, inform the determination of planning applications, and inform the management of future change. The Landscape Character Assessment updates the District's previous Landscape Character Assessment.

- 1.2 **The purpose** of this report is to update Members on the final versions of the Landscape Character Assessment and the Landscape Sensitivity Assessment undertaken by consultants LUC and seeks authority to adopt the final documents as Supplementary Guidance Documents, SPD's to inform the Local Plan preparation, future planning proposals and aid the determination process.
- 1.3 Supplementary Planning Documents, SPD's are documents that provide more detailed guidance around how the Council will implement policies in the Local Plan. They provide more detailed information that cannot be contained in the policies themselves. They give guidance to the public, applicants and developers when making applications and can be a material consideration in planning decisions but are not part of the Development Plan.
- 1.4 The draft SPD's were reviewed by the Council's Planning Policy and Built Heritage Working Party in October 2018, where a detailed report and presentation was given to Members. Authority to consult alongside the regulation 18 stages of the Local Plan with a view to adopting both documents as formal supplementary planning document was consented. The previous report and presentation can be found in the ModGov Library [here](#) and [here](#) and or by the links referenced below¹.
- 1.5 Both the LCA and LSA, have been prepared under the terms of the Planning and Compulsory Purchase Act 2004 and regulation 11-16 of the Town and Country Planning ((Local Planning) (England) Regulations 2012.
- 1.6 The North Norfolk Landscape Character Assessment, LCA and Landscape Sensitivity Assessment, LSA, were subject to public consultation in line with regulation 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 at the same time as the emerging Local Plan underwent public consultation during May and July 2019.
- 1.7 Both the LCA and LSA, provide supplementary detail to a variety of policies within the current adopted Local Plan and the emerging Local Plan. The LCA appraises the North Norfolk landscape and evaluates the area's defining characteristics in order to manage growth sustainably and to enable the inherent qualities of the North Norfolk Landscape to be taken into consideration, so that development does not undermine the defined valued features and characteristics. It will replace the current 2009 LCA upon adoption as a SPD. The LSA assesses the sensitivity of the North Norfolk landscape to various types of renewable energy and other industrial scale developments.
- 1.8 **Landscape Character Assessment** is a tool to identify what makes a place unique, and can serve as a framework for decision making that respects local distinctiveness. Understanding the character of place and evaluating an area's defining characteristics is a key component in managing growth sustainably and ensuring that the inherent qualities of North Norfolk's landscape can continue to be celebrated, creating places that people can be

¹ The links are:

Agenda : <https://modgov.north-norfolk.gov.uk/documents/s5531/Agenda%20-%202015%20October%202018.pdf>

Presentation: <https://modgov.north-norfolk.gov.uk/documents/s5533/Landscape%20Character%20presentation%20-%202015%20October%202018.pdf>

proud of. Understanding of character can be used to ensure that any change or development does not undermine whatever is valued or characteristic in a particular landscape.

- 1.9 **Landscape Sensitivity Assessment** provides an assessment of the relative landscape sensitivities of different landscape areas to different types of renewable energy and industrial type development at a strategic scale, without knowing the exact location, layout, design or mitigation proposed. It is based on the landscape character types identified in the LCA and is an important tool in informing the appropriate management of landscape change.

2. National policy

- 2.1 The NPPF calls for valued landscapes to be protected and enhanced, stating *'Planning policies and decisions should contribute to and enhance the natural and local environment by... protecting and enhancing valued landscapes, sites of geological value and soils (in a manner commensurate with their statutory status or identified quality)'* (para 170.a). The greatest weight is given to conserving and enhancing landscape and scenic beauty in National Parks and Areas of Outstanding Natural Beauty (AONBs) (para 172), but this does not mean that non-designated landscapes are not valued, or cannot be 'valued landscapes'

- 2.2 An up-to-date Landscape Character Assessment is recommended in the Planning Practice Guidance (PPG) to support planning decisions by local planning authorities. The evaluative section of a Landscape Character Assessment can provide useful evidence to help identify valued features and qualities.

- 2.3 Paragraph 180 of the NPPF contains reference to sensitivity as follows:

"Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development..."

- 2.4 The landscape sensitivity study will not only inform existing planning applications around renewable energy but also inform the emerging Local Plan approach in this area, where along with landscape sensitivity other considerations such as other physical constraints, other environmental constraints e.g. biodiversity and heritage and policy constraints such as the Undeveloped Coast will also need to be taken into account.

3 Consultation Feedback

- 3.1 For information, the feedback on the SPD's is contained within **Appendix 1** and to this report and summarised below.
- 3.2 The production of the two related assessments were broadly welcomed with the recognition of the inherent value of the landscape of Norfolk and the duty

to protect and enhance the defined character. A number of comments were made by Individuals and statutory bodies seeking clarification and more detail. **Appendix 1** details the feedback received and how this has been incorporated into the final versions.

- 3.3 In particular various additional references and mapping details have been incorporate to reflect comments from the Broads authority to enable greater cohesion between the authorities. Natural England provided general advice and sought greater detail around the incorporation of design features that could support wildlife and biodiversity net gain. No additional comments have been added in relation to this matter as it is considered that the guidelines in the documents for each landscape type already include broad measures to enhance biodiversity of the wider landscape such as improving ecological connectivity, use of native species, planting of hedgerows. Furthermore precise requirements for individual developments in this area could form part of the emerging North Norfolk Design Guide. Policies within the emerging Local Plan already reference the requirement for biodiversity net gain.
- 3.4 The final versions of the LCA and LSA SPD for adoption are available on the following links:
[Landscape Character Assessment \(LCA\) SPD](#)
[Landscape Sensitivity Assessment \(LSA\) SPD](#)
- 3.5 Next stages: as soon as reasonably practice after the planning authority has adopted the SPD's the documents will be published and made available at the Council's offices and on the Planning web site. An adoption statement which will set out the persons consulted during preparation, a summary of the main issues and how these were addressed (eg the schedule included in **Appendix 1**) will be prepared to accompany this. Once completed the adoption statement will also be sent to all those that asked to be notified of the adoption. In relation to the revocation/ withdrawal of the existing LCA, 2009, a statement of fact will be made available advising of the documents' withdrawal, removal from the web site and notice sent to organisations statutory consultation bodies and those individuals registered on the planning policy consultation data base in order to bring the action to the attention of persons living and working in the area, in accordance with the regulations.
4. **Recommendations:**
 1. **It is recommended that Members endorse the revised 2021 Landscape Character Assessment and Landscape Sensitivity Assessments as Supplementary Planning Guidance, SPD's and recommend to Cabinet for adoption and publication**
 2. **That the existing 2009 North Norfolk Landscape Character Assessment is revoked in line with the legislative requirements.**
 3. **That delegated authority is given to Head of Planning in relation to the statutory process required.**

5. Legal Implications and Risks

- 5.1 The Council must produce a Planning documents 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,. This includes the application of a consistent methodology which takes account of public feedback and national policy and guidance.
- 5.2 Both the LCA and LSA, have been prepared under the terms of the Planning and Compulsory Purchase Act 2004 and regulation 11-16 of the Town and Country Planning ((Local Planning) (England) Regulations 2012. The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making

6 Financial Implications and Risks

- 6.1 Failure to undertake plan preparation in accordance with the regulations is likely to render challenge and result in less weight been given to the evidence documents.

Appendices

Appendix 1 – Schedule of Representations with comments

Landscape Character Assessment SPD [Landscape Character Assessment \(LCA\) SPD](#)

Landscape Sensitivity Assessment SPD [Landscape Sensitivity Assessment \(LSA\) SPD](#)

This page is intentionally left blank

Appendix 1 Schedule of Representations LCA and LSA.

Landscape Character Assessment

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
LCA1	Draft LCA	Mr Colin Rice 1210475	Providing General Comments	<p>Figure 1.6 does not highlight the coastal development at places like Eccles, marking it as 'Coastal Settled Farmlands', whereas Figure 1.7 (covering the designations for Gt Yarmouth) has a separate category 'E: Dunes, coastal levels and resorts'. There is a case for an appropriate separate designation for the coastal strip development to be made in NN district too.</p> <p>Paragraphs 3.9 and 3.10 on cultural heritage focuses entirely pre-20C cultural assets - the 'high end' only - rather than including the modest plotland style development of the coastal strip which, after nearly 80 years, is an established part of the character of the coastal landscape. For those who have owned and looked after these houses, or holidayed in them, they represent as important an expression of our freedom and love of the area as the grand estates.</p>	The particular character of the coast development should be recognised as part of the richness and diversity of the human settlement, whereas it is largely ignored.	I would like to see the assessment amplified to give better recognition of humbler 20C and contemporary buildings in the landscape, rather than either ignoring them or seeing them purely as detractors.	<p><i>Fig 1.6 is at a regional scale, so the Coastal Settled Farmland designation is considered appropriate. Coastal strip development is included in the Coastal Plain designation within the North Norfolk LCA.</i></p> <p>Action: Remove note on Fig 1.6, 'Draft to be updated'</p> <p>Deleted</p> <p><i>3.9 and 3.10 relate to statutory listed heritage assets only</i></p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<p>In the summary of the section on Coastal Plain, there is no mention of the settlements that form part of it, i.e. Bacton, Walcott, Happisburgh, Eccles, Sea Palling, Waxham and Horsey.</p> <p>Indeed on p. 131 Sea Palling is listed in the Settled Farmland category when it is shown in the Coastal Plain.</p> <p>On p. 155 under 'Valued features and qualities', due recognition is given to the 20C wooden bungalows and chalets in Bacton, but there is no mention of such assets in other areas. Similar recognition should be given to Cart Gap, Eccles, Sea Palling and similar areas of the best of coastal strip development. The 'Landscape Vision' on p158 should include</p>			<p>p. 146 Coastal Plain LCT Summary. There is no mention of settlement so add para re presence of coastal strip development in shaping the character of this Type.</p> <p>Added</p> <p>p. 153 Name more places (e.g. Sea Palling, Eccles) in Key Characteristic no.6. Correct typo in No. 6 (mostly 19 os/os)</p> <p>Added and amended</p> <p>p.131 Remove error. Sea Palling is not in SF1. Add Catfield</p> <p>Amended</p> <p>p.155 Valued Feature no.5 After Bacton, add Ostend and Walcott</p> <p>Added</p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				a place for limited but good quality development of this type.			
LCA2	Draft LCA	Broadland District Council, Spatial Planning Team 1216187	Providing General Comments	Figure 1.7 and Figure 4.2 Both of these figures display the Broadland District Council landscape character areas, however, there is no key included to describe these. For consistency, it may be worthwhile to include these.			Fig 1.7 and 4.2 Add the Broadland and West Norfolk LCT's list to the Key in both of these Figures. Are all of the Gt Yarmouth LCT's shown graphically? Added and double checked
LCA3	Draft LCA	Norfolk Coast Partnership Gemma Clark 1217409	Providing General Comments	1.24 Our Integrated Landscape Character Assessment which was undertaken with our partner Local Authorities meant that our character types all dovetailed and enabled a more coordinated response to planning applications. With the changes to the new LCA it has meant that a couple of the character types are now different to our character types. A decision needs to be made as to whether we commission a new LCA and work to integrate these new changes, or whether we don't have our own LCA for the AONB and refer to the Local Authorities LCA'S. This is a conversation that can be had with the Landscape Officers to decide a way forward. We are happy to see Key Qualities of Natural Beauty of the Norfolk Coast included in the description and light pollution mentioned in many of the guidelines and forces for change.			<i>On-going discussion with the AONB Partnership. No action required</i>
LCA4	Draft LCA	Norfolk County	Supporting	Both of these documents acknowledge the important contribution that heritage assets			<i>Comments noted</i>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	<i>Proposed Action (Action in bold, Comment not bold)</i>
		Council, Laura Waters 931093 (on behalf of Historic Environment Team)		and the historic landscape make to the overall character of the North Norfolk landscape. The Sensitivity Assessment pays particular attention to former airfields within the district and highlights their heritage significance. From a historic environment perspective we are supportive of the overall conclusions of the two assessments and do not have any specific comments to make on them.			
LCA5	Draft LCA	Historic England Mrs Debbie Mack (Historic Environment Planning Adviser) 1215813	Supporting	We welcome the production of these two related assessments. We do not have capacity to review these documents in great detail but advise that these documents form an important part of the evidence base for the Local Plan and other work going forward. It is clearly important that consideration of the historic environment is given in the preparation of the landscape character assessment and we would expect the methodology to follow current best practice.			<i>Comments noted</i>
LCA6	Draft LCA	Broads Authority Natalie Beal (Planning Policy Officer) 321326	Providing General Comments	<ul style="list-style-type: none"> 1.5 says: ‘the eastern end of the District also adjoins The Broads, which has the status of a National Park’. This is not quite right. The eastern end of the District is the Broads and the Broads has a status equivalent to a National Park. 			Page 2. Para 1.5 Amend text to: ..The eastern end of the District forms part of the Broads, which has a status equivalent to a National Park. Since the planning jurisdiction in this area is managed by the Broads Executive Authority and not

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	<i>Proposed Action (Action in bold, Comment not bold)</i>
				<ul style="list-style-type: none"> • 1.10 – this needs to mention the Broads – the Broads is an asset to North Norfolk • The maps at the start – you could include the Broads Landscape Character Assessment by copying over the maps. • 3.9 and 3.10 – this needs to mention the Broads • Figure 3.7 – you could include our dark skies map as well. 			<p>North Norfolk District Council, these areas are excluded from this Assessment.</p> <p>Amended</p> <p>1.10 add the Broads to the list</p> <p>Added</p> <p>Figure 1.7, 4.1, 4.2 show adjacent LPA Landscape Types. Broads Authority area to be added and link to their LCA added to key</p> <p>Added</p> <p><i>Comment noted. 3.9 & 3.10 is a general comment about cultural assets across the District, so the Broads is already included.</i></p> <p>3.7 Add dark sky areas of the Broads that are within NNDC area.</p> <p>Also add the designated Dark Sky Discovery Sites at Wiveton Downs and Kelling Heath</p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<ul style="list-style-type: none"> Figure 4.1, 4.2 seems to exclude the Broads. LUC did our Broads Landscape Character Assessment and the information from that could be incorporated. To have a blank for the Broads is misleading and may have impacts as and when applications need to be considered in landscape terms near to the Broads. You could mention our LCA and refer to that rather than leaving a blank and include a link to the document. You could use a colour symbol and then provide the reference to our LCA in the legend? Page 131 – bottom left photo seems to have a formatting error 			<p>Holiday Park (AONB have data files)</p> <p>Added</p> <p>This LCA covers the areas of the District where NNDC has planning jurisdiction.</p> <p>Fig 4.1 should label the Broads Authority Area, as it does other LPA's.</p> <p>Added</p> <p>Fig 4.2 should include a graphic for the Broads and a link to their Character Assessment in the Key</p> <p>Added</p> <p>p.131 Amend photo Amended</p>
LCA7	Draft LCA	Natural England Consultation Service (Jacqui Salt) 931951	Providing General Comments	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Biodiversity enhancement</p>			<p><i>Comments Noted</i></p> <p><i>The Landscape Guidelines for each Type already include broad measures to enhance biodiversity of the wider landscape such as</i></p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	<i>Proposed Action (Action in bold, Comment not bold)</i>
				<p>This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Protected species</p>			<p><i>improving ecological connectivity, use of native species, planting of hedgerows. Precise requirements for individual development will form part of the revised North Norfolk Design Guide. Policies within the emerging Local Plan will reference the requirement for Biodiversity Net Gain</i></p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	<i>Proposed Action (Action in bold, Comment not bold)</i>
Page 22				<p>Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>			

Landscape Sensitivity Assessment

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
LSA1	Draft Landscape Sensitivity Assessment	Mr Peter Terrington 1215743	Providing General Comments	<p>Whilst erosion is recognised as a threat along the cliff coastline, east of Weybourne, the DLSA does not appear to recognise the threat caused by accretion of sand along the sand dune and marsh coastline, west of Weybourne. Accretion of sand in Wells and Blakeney harbours is creating economic, recreational and environmental impacts.</p> <p>There is strong circumstantial evidence to link the increased rate of accretion of sand in Wells and Blakeney harbours with the commencement of dredging and channel Deepening at Wells and placement of dredged spoil within the marine environment. Increased accretion of sand is also contemporaneous with the development of offshore wind farms and the trenching for cable routes. Obviously natural processes play a huge part in the erosion, transport and deposition of material along the North Norfolk Coast, but little research has been carried out about the part played by human intervention. Observations since 2009 suggest that the rate of accretion of sand has greatly increased. This has had a devastating impact on the mussel fishery at Morston, resulting in the virtual closure of the fishery, putting a number of mussel fishermen out of work. Increased accretion</p>	<p>The DLSA does not appear to consider the Impacts of localised dredging channel Deepening and placement of dredged material within the marine environment. The DLSA does not appear to consider the cumulative impacts of wind farm development and cable routes within the Wider North Sea on sediment movement and the accretion of sand along the lowland coastline of North Norfolk.</p>	<p>The Landscape Sensitivity Assessment needs to recognise the impacts that increased rates of accretion are having on the Open Coastal Marshes coastline and include in its policies a commitment to work with other groups, including the SWG, to investigate the causes of this increased accretion, identify the impacts and</p>	<p><i>The LCA recognises the highly dynamic and sensitive nature of the Open Coastal Marshes and Drained Coastal Marshes Landscape Types (highlighted as Key Characteristics within each Type). This is translated across into the LSA as High Sensitivity to all of the considered development types in these areas.</i></p> <p><i>The influence of human intervention on the dynamic processes and proposals for appropriate management and mitigation is more relevant to the Marine Management Organisation</i></p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				of sand in Wells and Blakeney harbours is also impacting on the offshore fishing industry and the recreational boating interests, as well as impacting on wildlife through the loss of feeding grounds. It is now necessary to regularly dredge inner harbour to keep the channel to the Quay open and around the pontoons at the Main Quay and at Tugboat Yard. Boating interests at Blakeney are seriously investigating the need to dredge Blakeney Harbour. The Wash & North Norfolk Marine Partnership (Formerly the Wash & North Norfolk EMS) has set up a Siltation Working Group to investigate the accelerated accretion of sand along the coastline and in the tidal inlets and it is forming partnerships with other bodies to try to find out why the rate of accretion has dramatically increased over recent years.		encourage mitigating measures to be put in place to alleviate the impacts.	
LSA2	Draft Landscape Sensitivity Assessment	Norfolk Coast Partnership, Ms Gemma Clark 1217409	Supporting	We are pleased to see the key qualities of natural beauty of the Norfolk Coast identified in the report. This looks to be an interesting study and the results should be cross referenced in the LCA, emerging HRA and SA. This will be a useful document for the Norfolk Coast Partnership to refer to on applications for renewable energy and low carbon development.			<i>Comments noted</i>
LSA3	Draft Landscape	Norfolk County	Supporting	Both of these documents acknowledge the important contribution that heritage assets			<i>Comments Noted</i>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
	e Sensitivity Assessment	Council, Laura Waters 931093 (on behalf of Historic Environment Team)		and the historic landscape make to the overall character of the North Norfolk landscape. The Sensitivity Assessment pays particular attention to former airfields within the district and highlights their heritage significance. From a historic environment perspective we are supportive of the overall conclusions of the two assessments and do not have any specific comments to make on them.			
LSA4	Draft Landscape Sensitivity Assessment	Historic England Mrs Debbie Mack (Historic Environment Planning Adviser) 1215813	Providing General Comments	We welcome the production of these two related assessments. We do not have capacity to review these documents in great detail but advise that these documents form an important part of the evidence base for the Local Plan and other work going forward. It is clearly important that consideration of the historic environment is given in the preparation of the landscape character assessment and we would expect the methodology to follow current best practice.			<i>Comments noted</i>
LSA5	Draft Landscape Sensitivity Assessment	Broads Authority Natalie Beal (Planning Policy Officer) 321326	Providing General Comments	<ul style="list-style-type: none"> • Executive Summary, particularly para 6, does not mention the Broads and needs to. Development outside of the Broads can impact on the Broads. 			<p><i>Executive Summary</i> <i>Add reference to the Broads being a designated landscape immediately adjacent to the District that could be impacted by renewable energy development, e.g. wind turbines.</i> Complete</p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<ul style="list-style-type: none"> • 1.3 needs to mention the Broads. • 2.4 says: ‘the eastern end of the District also adjoins The Broads, which has the status of a National Park’. This is not quite right. The eastern end of the District is the Broads and the Broads has a status equivalent to a National Park. 			<p>1.3 Add sentence.. <i>The eastern section of the District lies within the Broads, a national landscape designation equivalent to a National Park, where the Broads Executive Authority has planning jurisdiction.</i> Added</p> <p>2.4 Amend to read.. <i>The eastern end of the District lies within the Broads, which has the status of a National Park and where the Broads Executive Authority are the planning body. For the purposes of this Assessment, only areas of the District where NNDC is the Local Planning Authority have been included.</i> Amended</p> <p>Figure 2.2 and 2.4 are just the NNDC</p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<ul style="list-style-type: none"> • Figure 2.2, 2.4 seems to exclude the Broads. LUC did our Broads Landscape Character Assessment and the information from that could be incorporated. To have a blank for the Broads is misleading and may cause issues as and when applications need to be considered in landscape terms near to the Broads. You could mention our LCA and refer to that rather than leaving a blank and include a link to the document. You could use a colour symbol and then provide the reference to our LCA in the legend? • 2.18 and 2.19 – needs to include the special qualities of the Broads in a similar way to the AONB section does. See b7.4 of our Local Plan. • Table 5.1 only refers to the AONB. It has an ‘out of AONB’ column. It needs to have an ‘out of Broads’ column. • Section 5 does not seem to mention the Broads and needs to. 			<p><i>Landscape Classifications. The Broads could be included as a lighter colour and the Broads LCA referenced in the key via a hyperlink</i> <i>Amended</i></p> <p><i>2.18 Add..The Authority has planning jurisdiction and has a special duty to</i> <i>Added</i> <i>Add list of defined special qualities of the Broads from the Broads Local Plan?</i> <i>Added</i></p> <p><i>NNDC is the Local Planning Authority for much of the AONB, but not for the Broads. The LSA is a tool to guide development within the NNDC planning area.</i></p> <p><i>Table 5.1 Add below table...</i></p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<ul style="list-style-type: none"> The report needs to include parts of or cross refer to our landscape sensitivity study and it still needs to consider the setting of the Broads. Figures 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7 - seems to exclude the Broads. LUC did our Broads Landscape Sensitivity Study and the information from that could be incorporated. To have a blank for the Broads is misleading and may have impacts as and when applications need to be considered in landscape terms near to the Broads. You could mention our LSS and refer to that rather than leaving a blank and include a link to the document. You 			<p><i>In the case of any of the types of development listed above, due regard should of course be given to the impact of the development on adjacent Landscape Types, both within the NNDC District and in neighbouring local authority areas.</i> Added</p> <p><i>Figures 5.1 to 5.7 should all include the Broads Authority Area, graphically and referenced in the Key</i> Added</p> <p><i>The LSA is limited to areas of the District where NNDC has planning jurisdiction.</i></p> <p><i>Maps already show the Broads Authority area</i></p>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<p>could use a colour symbol and then provide the reference to our LCSS in the legend?</p> <ul style="list-style-type: none"> • Section 5.2 needs to have a row for the Broads. <ul style="list-style-type: none"> • Appendix 1 could have the Broads as an area copied over from our LSS or again cross referred. 			
Add.. LSA6	Draft Landscap e Sensitivity Assessme nt	Natural England Consultatio n Service 931951	Providing General Comments	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major impacts on the natural environment. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraphs 8, 72, 102, 118, 170, 171, 174 and 175 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst</p>			<i>Comments noted</i>

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<p>other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>Protected species Natural England has produced Standing Advice to help local planning authorities assess the impact of particular developments on protected or priority species.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional</p>			

ID	Section	Consultee	Nature of Response	Comments (as submitted)	Summary (as submitted)	Proposed Changes (as submitted)	Proposed Action (Action in bold, Comment not bold)
				<p>circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>			

This page is intentionally left blank

Recreation Avoidance Mitigation Strategy

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final in principle policy approach in addressing the impacts of growth through the adoption of a Green Infrastructure and Recreational Avoidance and Mitigation Strategy.

- Recommendations:**
- 1) It is recommended that Members endorse the approach, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated tariff and Policy to be included in the Local Plan to the Planning Manager.**

 - 2) In relation to the collection of the tariff it is recommend that Members endorse and recommend to Cabinet Option 1**

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	
Kerys Witton: Landscape officer, 01263 516323 kerys.witton@north-norfolk.gov.uk	

1. Introduction

1.1 It is a legal requirement that all Local Plans are subject to Habitat Regulation Assessment. These Assessments are undertaken to ensure that the Plans Policies and Proposals will not result in any significant adverse impacts on internationally recognized wildlife sites and where the potential for such impacts arises there is an agreed process of mitigation.

The draft Local Plan was subject to an interim Habitat Regulation Assessment and a final Assessment is in preparation. Both indicate that the proposed housing growth, in North Norfolk and in combination with that planned across the county, will increase the number of recreational visitors to many of the important wildlife sites in the District. If left unmitigated this has the potential to have significant adverse impacts resulting from recreational disturbance.

1.2 This is an issue which affects all Local Plans in Norfolk and working under the Duty to Co-operate the member Authorities have been considering a single shared approach to address potential impacts. This report explains the emerging approach (the development of a Recreational Avoidance Mitigation Strategy – RAMS) and considers this, and the representations made at Regulation 18 stage of plan preparation, and recommends modifications to appropriate policies and the creation of a new stand along policy to clearly articulate the Council's approach in order to ensure that the Plan meets the legal requirements of the Habitat Regulations. The report does not seek final

endorsement of the RAMs strategy or policy but the in principle decision in relation to the setting of financial tariffs and the wider policy approach in order to further the Local Plan and help progress the evidence base including that of the Habitat Regulation Assessment of the Local Plan. The final approach will be subject to further reports once this work is finalized by the Duty to Co-operate forum.

- 1.3 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.

- 1.3 This report focusses on the updated approach to offset recreational impacts on protected European sites arising as a result of the growth in residential dwellings and tourism accommodation (known as Habitats Sites in accordance with the national planning policy framework, NPPF). It is necessary so that project level Habitat Regulation Assessments, HRAs and the HRA of the Draft Local Plan can reach a conclusion of no adverse effect on the integrity of European sites in accordance with the findings of the Interim Habitats Regulation Assessment, to accord with Habitat legislation and Natural England's, NE, Interim advice, contained in **Appendix 1**.

- 1.4 The Regulation 18, interim HRA concluded that there are measures contained in the emerging Plan that are *capable of providing the necessary certainty to enable a conclusion of no adverse effects at the next iteration of the HRA.(Final)*. One such matter was identified as the *progression of the strategic mitigation strategy for recreation pressure across the Norfolk European sites*¹.

- 1.5 Policy ENV4, Biodiversity and Geology, includes reference to developer contributions being required to ensure that visitor impact mitigation on European sites will be in line with the emerging Recreational Avoidance & Mitigation Strategy for recreational impacts on those sensitive sites. The Interim HRA advised in para 5.6 that the wording was adequate for that stage (Regulation 18) of Plan making but that there would be benefit in setting out more clearly the requirements for European sites as a separate policy to the wider requirements for biodiversity and geodiversity. The study went on to recommend that the policy be revisited so that there was more clarity and certainty around developer requirements in relation to the strategic mitigation approach required to alleviate recreational pressures on the protected European sites.

¹ Interim HRA 2019 para 11.1/11.3

- 1.6 The potential for recreational activities to disrupt the protection objectives of Habitats Sites in and around Norfolk is related to the level of growth in each Local Plan 'in combination'; specifically an increase in population resulting from identified new housing requirements across the county that will in turn result in more people visiting Habitats Sites for recreation. This growth, combined with an increase in tourism accommodation, will result in more people visiting and possibly harming Habitats Sites.
- 1.7 In the past, HRAs for Norfolk authorities have concluded that significant impacts were only likely where protected sites were within or in close proximity to the districts themselves. However, more recent evidence and research indicates that effects on some sites are likely to extend much further than the LPA boundary and as it is not possible to rule out residual effects, strategic mitigation as identified by Natural England is proposed and forms the basis for the joint Local Authority approach set out in the emerging Recreational Avoidance Mitigation Strategy, RAMs.
- 1.8 The strategy has been produced to support Local Planning Authorities (LPAs) in Norfolk in their statutory requirement to produce 'sound' i.e. legally compliant Local Plans for their administrative areas and as such form part of the evidence base for Local Plans. The strategy includes a template approach for project level HRAs which helps the Council to ensure that residential planning applications, which have the potential to impact on Habitats Sites are also compliant with the Habitats Regulations. The strategy is required in order to ensure that Local Plan(s) can be adopted and to enable growth in the District through the implementation of measures to avoid adverse effects on the integrity of Habitats Sites.
- 1.9 Local planning authorities are responsible for ensuring that policies and proposals contained in their Local Plans and developer proposals to them do not have an adverse effect on the integrity of European sites. Although this being a response to European legislation the requirement is transposed into English law by such legislation as the Environmental Assessment of Plans and Programmes Regulations 2004, and the conservation of Habitats and Species Regulations 2017(as amended) and will continue to do so even after the UK leaves the EU.
- 1.10 The Habitats Regulations provide for the designation and protection of 'European sites', (also known as Natura 2000 sites), the protection of 'European protected species', and the adaptation of planning and other controls for the protection of European Sites (referred to as Habitats Sites in accordance with the NPPF). Regulations 63 and 64 of the Habitats Regulations require a series of steps and tests to be followed for plans or projects that could potentially affect a Habitats Site. These steps are commonly referred to as the Habitat Regulation Assessment, HRA process and apply to the competent authority (in this case the LPA) which must undertake to consider whether a proposed development plan or programme is likely to have significant effects on a Habitats Site.
- 1.11 The additional growth brought forward through Local Plans will lead to more people visiting Habitats sites and has the potential to cause more disturbance to wildlife and habitats. The RAMs identifies a programme of County wide mitigation measures aimed at delivering the mitigation necessary to avoid and mitigate the predicted adverse effects on the integrity of the Habitats Sites

from in-combination residential and tourist growth through a set programme and a per dwelling tariff.

- 1.12 It remains important to acknowledge that the RAMS exists to mitigate ‘in-combination’ effects specifically. It is not a mechanism to deliver mitigation for recreational impacts from individual residential developments alone or individually; It will be essential to divert and deflect visitors away from sensitive Habitats Sites through the provision of Green Infrastructure on/near the development site, for the purposes of avoidance in the first instance and to avoid adverse effects on the integrity of these sites. In order to do this the GI/RAMS report states that it is essential that LPAs secure the provision of GI at both the development site and plan making level and to do so at a certain quality standard. To this effect The Local Plan brings forward a suite of policies not least the previously endorsed approach to open space provision which details on site and off site provision against local standards but also through an updated Policy ENV5 Green Infrastructure requirements and a host of specific site allocation policies where a specific reference to green infrastructure and enhanced green infrastructure is necessary depending on their proposed development numbers.

2 Background and Update

- 2.1 Habitats Sites, include Special Protection Areas (SPAs), Special Areas of Conservation (SACs), European Marine Sites, but also include and Ramsar sites (wetland sites designated to be of international importance under the Ramsar Convention) and *candidate* sites. These represent those areas with the highest level of designation for wildlife interest in Europe and ensuring that their protection objectives are not compromised is of paramount importance.
- 2.2 Within North Norfolk, such sites include the North Norfolk Coast SAC/SPA, the Wash and North Norfolk Coast SAC and European Marine Site, Overstrand Cliffs SAC, Winterton Horsey Dunes SAC, the Norfolk Valley Fens SAC, the River Wensum SAC (one of the best examples of a chalk river in the country) and the Broads and Broadland SAC and SPA.
- 2.3 The strategy builds on earlier work by Footprint Ecology which was reported to and endorsed by this working party in March 2017 and subsequently Cabinet. This study was principally concerned with establishing the number and behaviour of visitors at the designated sites as well as drawing analysis around routes and distance travelled and frequency of use, all at different times of the year. As such it helped establish the links between new housing development and recreation use and provides evidence to inform the Local Plan including the development of appropriate monitoring and mitigation measures. In relation to North Norfolk the survey data showed the European sites in North Norfolk had a strong draw both locally and from further afield on a daily basis and that on average across Norfolk based on the then predicted Local Plan growth levels of 16% across Norfolk there is a predicted increase of access to European sites of 14%, (without mitigation). For North Norfolk there is an estimated 9% increase in access (without mitigation) but this is from a range of districts, including growth in Greater Norwich, Kings Lynn and West Norfolk. However there are variations with the most marked increase in the Brecks at 30%. (Breckland). This is due to a combination of high levels of growth and short distance travelled to access the sites. By contrast access to European sites over the remaining broad locations were reported as: Valley

Fens 28%, Royden & Dersingham, 15%, The Broads, 14%, East Coast 11% & the Wash, 6%.

- 2.4 The survey data also showed a range of different use and recreational draw for the different sites which ranged from recreational walking, dog walking, to holiday use which accounted for nearly half of all visitors surveyed. In terms of frequency of use 36% of the people interviewed visited daily, 12% 1 to 3 times a week, 24% 1 to 3 times per month 16% less than once a month and 12% first visit.
- 2.5 Since then the HRA work undertaken for the individual Local Plans across Norfolk has identified a common theme regarding the potential for recreational activities to disrupt the protection objectives of Habitats Sites in and around Norfolk. This is related to the level of growth in each Local Plan, specifically an increase in population resulting from identified new housing requirements that are within the 'Zone of Influence' (ZOI) for likely significant effects regarding recreational disturbance at Habitats Sites. i.e the extent to which residents and visitors will travel to Habitat Sites for recreational activities.
- 2.6 In response to the potential increase in visits from recreational growth due to population and tourism growth there is an opportunity to address mitigation strategically through a combined Green Infrastructure and Recreational Avoidance Mitigation Strategy, RAMs

3 The Strategy

- 3.1 The RAMs is a costed per unit tariff based strategy that identifies a detailed programme of county wide mitigation measures aimed at delivering the necessary mitigation to avoid adverse effects on the integrity of the Habitats Sites from in-combination effects of new recreational growth (including that from tourists). The strategy is funded from developer contributions and based on a series of base line reviews of existing studies, stakeholder workshops and partnership work through the Norfolk Strategic Framework. It is not designed to deal with existing recreational impact issues just that of future predicted impacts. The strategy has been undertaken in collaboration with all other Norfolk Planning Authorities including the County Council, NCC, and Natural England, NE, and with the assistance of other stakeholders such as the Forestry Commission and Norfolk Wildlife Trust through the Norfolk Strategic Framework, NSF. Place Services were commissioned to undertake the detailed work. A steering group comprising of representatives of the LPA's, NCC, NE guided the project.
- 3.2 The strategy includes the requirement for the provision of well-designed open space/green infrastructure on-site for appropriate developments (Enhanced Green Infrastructure) and or delivery/contributions towards strategic green infrastructure (as identified in the Council's Green Infrastructure Background Paper, and enhancements through Strategic Opportunity Areas) in order to assist in taking the strain away from people visiting Habitats Sites for recreation. The RAMs specific mitigation includes the provision of a team of rangers that provide a presence at the Habitats Sites, who's role would include informing visitors and directing them to less sensitive areas, providing walks, talks and monitoring and management duties such as ensuring appropriate signage is in place and car parking is managed. Their role would

also be to liaise with landowners and partners to manage sites and help monitor sensitive habitats and species.

3.3 Having reviewed the counties open space provision to ascertain if there is a need to provide enhancement at a county level in order to meet an improved standards high enough to act as a diversion from existing Habitat Sites the study also concluded that there is no need for any new county wide provision / strategy of GI. In concluding this the study evidenced the essential need for LPAs to also secure the provision of on-site GI (or developer contributions) and identified Strategic Opportunities Areas, SOA, which could be developed to meet an enhanced standard and help act as genuine alternatives to the existing recreational destinations and help rectify deficiencies in existing provision. In North Norfolk four Strategic Opportunity Areas were identified:

- **SOA1:** lying to the north of the strategic GI corridor and the town, of **Fakenham**, opposite the Rudham Stile Lane site allocations and provides the opportunity to increase the amount of publically accessible natural or semi natural greenspace , enhanced walking routes, woodland and open space.
- **SOA2: Holt Country Park** to the South of Holt and on the edge of the Norfolk Coast Area of Outstanding Natural Beauty (AONB) . Here further enhancements could be made to increase accessibility, attract a wider audience and the creation and enhancement to biodiversity and GI network. Suggestions include outreach and educational events, Art and sculpture and network improvements.
- **SOA3: Weavers Way** –Enhancements including the addition of a circular rout around Great Wood and Felbrigg through enhanced signage, managed footpaths and different routes for different capabilities.
- **SOA4: North Walsham-** although well served by the Norfolk Trail network including the 61 mile Weavers Way connecting Cromer to Great Yarmouth and linkage into the coastal path, Angles Way, Wherryman’s Way the Paston Way, Bure Valley Way and the Marriots Way at Aylsham, many towns and villages to the west and south west do not meet natural England Accessible green Instructure Standards of having a 100ha greenspace within 5km, ANGST. The town is proposed to have a significant western urban extension and as such opportunities exist for the enhancements to existing Public rights of way, PRoW, such as Weavers Way and Paston Way, as well as enhancements to recreational opportunities in this area. The study recommends specifically that - *North Walsham Wood, Lord Anson’s Wood, Bacton Wood and Perch Lake Plantation and the surrounding area. Collectively these areas could become a new Country Park/SANG (or equivalent) and enable access into surrounding PRoW and long-distance trails. Currently Lord Anson’s Wood is an allocated site in Norfolk Waste and Minerals Local Plan for sand and gravel extraction. However, it is recommended it be restored to heathland with public access, which could be incorporated into any future project.* Such recommendations and opportunities will be considered further in the allocation policy and emerging Development Brief for North Walsham Sustainable Urban Extension, SUE.

3.4 The strategy recommends that existing or proposed localised Green Infrastructure Strategies are reviewed and policies updated to include the requirement to provide enhancements through ‘Enhanced Green Infrastructure’. EGI is defined as GI that is in addition to any local policy requirements on open space but at an enhanced scale and quality sufficient

to provide an alternative space to Habitats Sites. Furthermore, to avoid adverse effects on the integrity of Habitats Sites from the development alone, that larger scale development proposals of 50 units plus, should incorporate Enhanced Green Infrastructure at a proportionate scale to the development.

- 3.5 Enhanced Green infrastructure is necessary at the local (development site) level and the strategic (Local Plan making) level to divert and deflect visitors from Habitats Sites, and is often referred to as Suitable Alternative Natural Greenspace (SANGS). The provision is part of the overall strategy and in addition to the package of mitigation measures founded through the tariff based approach. Collectively the EGI and mitigation measures work in combination as a single strategy. SANGS are usually one area of an alternative attractive semi-natural environment but in the context of the Norfolk GI/RAMS, EGI is proposed as an alternative to a SANG and can incorporate a network of open spaces, permissive routes and natural or semi-natural environments across a given area. The GI/RAMS recommends that an EGI quality audit is undertaken of all existing open spaces against a set quality criteria to ensure the effectiveness of the EGI. This audit should incorporate further visitor surveys to ensure that that it meets the local need. As such this is potentially an area of future work.
- 3.6 A template approach is recommended for Project level HRA's where LPA's can record their decisions and through which sites that are predicted to have impacts from each development can be prioritised through the package of measures included in the RAMS.
- 3.7 A per dwelling tariff has been calculated based on the costed package of measures relevant to the impacts and the total number of houses/development still to come forward over the Local Plan(s) period. As such the approach seeks to mitigate the additional recreational pressure in a way that ensures that those responsible for it pay to mitigate it at a level consistent with the level of potential harm and consequently allows the emerging Plans that plan for growth to be HRA compliant, which in turn sets out a framework for individual development proposals to also be HRA compliant.
- 3.8 The costs are subject to final checks and clarification of overall plan numbers but are set to be in the region of £7.9m for the mitigation package and represents a planning contribution that must be **paid for each net new dwelling delivered across the District and County of £205.02²**. In relation to different Use Class such as tourism accommodation specialist accommodation and student accommodation the tariff is split into bed space unit equivalents with the study recommending developer contributions on a 'per six bed space ratio' of the tariff identified for residential growth. As each LPA represents the competent authority in terms of its own obligations to the HRA, each LPA will be responsible for collecting the tariff from all qualifying dwellings that fall under its jurisdiction and for monitoring the tariff contributions that they receive from developers.
- 3.9 In order to identify appropriate Zones of Influence, ZOI i.e a designated distance that establishes where development is likely to have a significant effect on a Habitats Site and where development occurring within can be expected to generate additional recreational visits to Habitats Sites, and

² As of October 2020

hence be expected to contribute, the study analysed postcode data from survey data. Individual site ZOIs were first established which showed significant overlaps between sites and varied due to their geographical position. The data was then further refined to identify an overall ZOI for both residential and tourist development utilising best practice methodology agreed with Natural England. It showed that the whole of the county is evidenced to be covered by one ZOI for residential development. A larger ZOI is also identified and evidenced for tourism development and which also goes some way as to demonstrating the huge distance people travel and the appeal of the Norfolk and in particular North Norfolk to visitors.

- 3.10 As the most up to date and robust evidence these Zones of Influence will also inform updated Impact Risk Zones published by Natural England and it is advised they will be essential to reference in preparing project level HRA's at application stage.
- 3.11 In terms of implementation the study recommends that a project Steering Group is set up of LPA partners and other specialist bodies in order to manage the ongoing project and that a project officer be employed to deliver the mitigation and manage the wardens. Each LPA would pool contributions collected. It is anticipated that this next stage of the project will be co-ordinated via the existing Duty to Co-operate Framework and through the Norfolk Strategic Framework Members Forum.
- 3.12 Mechanisms already exist for collecting contributions from housing developments in the form of 'Section 106' agreements, 'Section 111' (up-front payment) agreements, or 'Unilateral Undertakings'. The study recommends that the Council adopt an approach of both S106 and S111 agreements advising that contributions be sought through S106 agreements where there are other contributions to be collected and through S111 agreements only where this is the sole developer contribution.
- 3.13 For the purpose of clarity S111 are legal obligations between developers and the LPA based around upfront payment at planning application stage, with monies being returned if an application is subsequently refused. Their use would allow for determination in the normal time frames and not slow down the issuing of any decision notice in this regard.
- 3.14 **Without such contributions, planning permission should not be given** as the payment is towards a mitigation package which is required to make all residential development acceptable in planning terms as per section 106 of the 1990 Town and Country Planning Act.

4 Regulation 18 Feedback

- 4.1 All of the Regulation 18 consultation feedback has been published in the Schedule of Responses, previously reported to Members. For information, the feedback in relation the proposals put forward in relation developer contributions in order to mitigate visitor pressure through developer contributions was included in Policy ENV4 and is contained within **Appendix 2** to this report and summarised below.
- 4.2 Statutory Bodies: Natural England welcomed the commitment to a strategic approach to mitigate recreational visitor impacts to European sites and the

protection afforded wider designated sites. In their response they reaffirmed that *Developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify impacts and mitigation, resulting in the delivery of a costed suite of measures...* They acknowledged the joint LPA work to date on the GI/RAMS strategy, supporting a separate policy in this area and strongly advised the Council adopt an interim payment per dwelling in the absence of an established (Local Plan – my emphasis) strategy to ensure new residential development and any associated recreational disturbance impacts on European designated sites are compliant with the Habitats Regulations, in accordance with the best available evidence and to address the in combination impacts arising.

- 4.3 Developer responses included general comments from Gladman who concluded that the trust of approach contained in Policy ENV4 was consistent with the NPPF and sufficiently flexible providing the opportunity for mitigation where direct or indirect adverse effects on designated sites are unavoidable. For clarity they sought the policy should be reworded making clear that contribution required should be linked to the increased usage of European sites associated directly from individual proposals. However for reasons stated this does not hold true, It is for effects arising through growth in combination.
- 4.4 Norfolk Wildlife Trust also commented and gave support to a separate policy and county wide approach outlined including seeking developer contributions regarding visitor pressure and agreed with the interim HRA at this stage on this matter.
- 4.5 Norfolk Homes sought clarifications on the evidence to support such a tariff, and the measures required calling for greater public scrutiny / examination.
- 4.6 No comments were received on the matter via town and parish councils and one specific comment was received from a member of the public objecting on the lack of evidence for such policy.

5 National Policy and Guidance

- 5.1 Para 177 of the NPPF sets out that the presumption in sustainable development does not apply where a plan or project is likely to have a significant effect on a Habitats site- either alone or in combination with other plans or projects, unless an appropriate assessment³ has concluded that the Plan or project will not adversely affect the integrity of the Habitats Site.
- 5.2 Para 171 advises also that Plans should: ...take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- 5.3 As detailed in para 1.7 of this report the Conservation of Habitats and Species Regulations 2017,(as amended) commonly known as the Habitats Regulations provide for the designation and protection of Habitats (European) sites. It is these regulations that Plans and project including individual

³ The 'Habitats Regulations Assessment' (HRA) process that competent authorities must undertake to consider whether a proposed development plan or programme is likely to have significant effects on a Habitats Site is undertaken in stages. The HRA stage 2 is often referred to as 'Appropriate Assessment' (AA) although the requirement for AA is first determined by an initial HRA 'Screening' stage undertaken as part of the full HRA.

planning applications need to demonstrate no adverse impacts on the integratory of the Habitat Sites.

6 Conclusions

- 6.1 The issue of mitigating impacts on the Districts European sites is nothing new to the Council. It was necessary to include policy requirements for prior approval of a scheme of mitigation on such sites arising out of increased visitor pressure in the now adopted Site Allocation DPD. Such an approach has generally moved towards a tariff based approach. The additional best available evidence now available coupled with the findings of the interim HRA indicates that all residential and tourism development has the potential for adverse impacts and as such suggests the approach is widened to cover all residential and tourism growth not just allocated sites and updated to deliver the mitigation.
- 6.2 The initial survey work on visitor numbers at European sites undertaken by Footprint Ecology provide detailed evidence of current and projected visitor patterns across the Norfolk European sites and demonstrated that on average there would be approximately a 14% growth at each site without intervention. The Place Services study builds on that by identifying the required zones of influence and provides a strategic framework designed to deliver the detailed programme of County wide mitigation measures aimed at delivering the mitigation necessary to avoid adverse impacts on the integrity of the Habitat Sites from in combination recreational impacts caused by residential and tourist growth.
- 6.3 The interim HRA has identified the importance of ensuring the mitigation strategy is in place and highlighted the requirement for an individual policy to be in place in order for it to conclude appropriately. **Natural England advise a strategic approach is adopted and this is evidenced through the Place Service study which identifies the single zone of influence covering the wider region, the mitigation measures required and in relation to the level of growth yet to come forward the appropriated tariff per unit required to deliver the mitigation.**
- 6.4 Feedback indicated from statutory bodies highlights the importance and the necessity to include the strategic approach and Natural England advised in their regulation 18 consultation feedback that the subject should be covered by a specific individual policy. Furthermore Natural England in their interim advice note dated 12th August 2019 advised that “...*This strategy will form an evidence base for local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with the Habitats Regulations...*” For clarity this is identified as including all unplanned growth that may come forward in the timeline of the project
- 6.5 Natural England go on to state that once the Zones of Influence are established it is anticipated that “***any new residential development within an identified zone will constitute a likely significant effect (LSE) on the sensitive interest features of the above designated sites through increased recreational pressure, either when considered ‘alone’ or ‘in combination’.*** The RAMS (or associated Supplementary Planning Document) will, once adopted, specify requirements for developer

contributions via a per house tariff to an agreed and costed suite of measures which have been developed to mitigate impacts to these designated sites”

- 6.6 A proportionate financial contribution is therefore required to make all residential developments acceptable in planning terms as per Section 106 of ‘The 1990 Town & Country Planning Act. Without such a contribution, planning permission should not be given to residential schemes due to the subsequent effect on Habitats Sites and the legal compliance by the LPA to avoid adverse effects on integrity of Habitats Sites.
- 6.7 As the competent authority needs to meet its legal commitments, each LPA will be responsible for collecting the tariff from all qualifying dwellings and for monitoring the tariff contributions that they receive from developers. Addressing this required is a complex area covering developer contributions, the delivery of appropriate Green Infrastructure and the consideration of biodiversity and project level HRA’s. **In addressing the impacts of visitor recreation It is proposed that an additional policy is drafted and included in the Local Plan along with further references in other policies as required to clearly set out the requirement** that contributions from developments will be secured towards the package of mitigation measures and Enhanced open space requirements identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. Including. Specific site allocation policies will also include reference to appropriate contributions and detail the specific opportunities for enhanced Green infrastructure in line with the identified opportunities. **Appendix 3** of this report contains the proposed draft policy extracts. The final wording of such policies will be aligned with any subsequent recommendations from the Norfolk Strategic Framework and the final study. It is anticipated that a further Supplementary Planning Guidance document may need to be produced some time in the future and referenced to in the Local Plan.
- 6.8 Coupled with the collection of the tariff is the delivery of the mitigation. In line with the study findings it is proposed that this will be delivered through the project level HRAs and reflect the impacts that individual proposals make to the relevant European sites. Collectively the pooled contributions and mitigation package will be delivered across Norfolk through the establishment of the relevant project board through the NSF.
- 6.9 **In establishing and pooling contribution Members have two options:**
- Option 1** – in line with Natural England’s Interim advice, as outlined in para 6.4 and contained in **Appendix 1**, collect the established tariff towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy, GI/Rams Strategy in order to deliver all measures identified through project level HRA’s or otherwise, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitat Directive on all appropriate development, once the Place Services study has been adopted.
- Option 2** – in line with the study’s reasoned outputs⁴ collect the tariff towards mitigation measures identified in the Norfolk Green Infrastructure and

⁴ Para 3.3.3 page 90 Place Services.

Recreational Impact Avoidance and Mitigation Strategy, GI/Rams Strategy once the Local Plan is adopted by the NSF.

- 6.10 Option 2 would provide for a staggered start to the GI/RAMS project and build funds only after the Local Plan is adopted. In the interim the current Site Allocation DPD policy approach would persist. The emerging Plan for North Norfolk includes a reliance on windfall sites and the tariff established includes these in its calculation. Should these and or other proposals come forward ahead of the Plan it may not be possible to demonstrate no adverse impacts and as such permission should be refused. In addition the full mitigation package may not be able to be funded without a readjustment of the tariff. Natural England's interim advice supports the introduction of the tariff in advance of Local Plans once the zones of influence have been established. Given the above and the fact that the Zone of Influence has/have since been established and covers all of North Norfolk **it is recommended that option 1 be endorsed and the collection of the tariff and the pooling of funds be commenced through project level HRA's following the adoption of the study** through the Norfolk Strategic Framework.

7 Recommendations

- 1- It is recommended that Members endorse the approach, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated tariff and Policy to be included in the Local Plan to the Planning Manager.**
- 2- In relation to the collection of the tariff it is recommend that Members endorse and recommend to Cabinet Option 1.**

8 Legal Implications and Risks

- 8.1 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.
- 8.2 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.
- 8.3 **Plans and Projects** which have the potential to impact on European designated sites are compliant with the Habitats Regulations, **namely** Conservation of Habitats and Species Regulations 2017, as amended (commonly known as the 'Habitats Regulations'). Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

9 Financial Implications and Risks

- 9.1** 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 – Natural England Advice letter
Appendix 2 – Regulation 18 Consultation Feedback Summary
Appendix 3 – Draft Policy Approach

This page is intentionally left blank

Date: 12 August 2019
Our ref: 257629

Broadland District Council
Breckland District Council
Great Yarmouth Borough Council
King's Lynn & West Norfolk Borough Council
North Norfolk District Council
Norwich City Council
Norfolk County Council
South Norfolk Council
Broads Authority



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Emerging strategic approach relating to the Norfolk Recreational disturbance Avoidance and Mitigation Strategy and Green Infrastructure Strategy. Interim advice to ensure new residential development and any associated recreational disturbance impacts on European designated sites are compliant with the Habitats Regulations.

Dear Sir/Madam

Natural England welcomes that fact that Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, The Borough Council of King's Lynn & West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council, Norfolk County Council and the Broads Authority are working in partnership on a countywide Recreational Avoidance Strategy (RAMS) and Mitigation and Green Infrastructure Strategy (GI).

The Norfolk RAMS and GI Strategy is a large scale strategic project which involves all of the Norfolk authorities working together to help mitigate the effects of recreational disturbance impacts on sensitive designated sites likely to arise as a result of increased housing over the respective local plan periods. This approach will build on the existing evidence included within the Norfolk Visitor Survey Report¹ which provides a comprehensive analysis of current and projected visitor patterns to European designated sites across Norfolk. Once finalised and adopted, the RAMS will comprise of strategic mitigation measures to address such effects, which will be costed and funded through developer contributions.

This strategy will form an evidence base for local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with the Habitats Regulations². It specifically relates to additional recreational impacts that may occur on the interest features of the following European designated sites:

- Ouse Washes SPA, SAC and Ramsar
- Breckland SPA and SAC

¹ Panter *et al* (2016) *Visitor Surveys at European Protected Sites across Norfolk during 2015 and 2016*, Footprint Ecology sites

² Conservation of Habitats and Species Regulations 2017, as amended (commonly known as the 'Habitats Regulations'). Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process. The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

³ Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

- Roydon Common and Dersingham Bog SAC
- Roydon Common Ramsar
- Dersingham Bog Ramsar
- The Wash SPA and Ramsar
- The Wash and North Norfolk Coast SAC
- North Norfolk Coast SAC, SPA and Ramsar
- Overstrand Cliffs SAC
- River Wensum SAC
- Norfolk Valley Fens SAC
- Winterton - Horsey Dunes SAC
- Great Yarmouth North Denes SPA
- Broadland SPA
- Breydon Water SPA
- The Broads SAC
- Waveney and Little Ouse Valley Fens SAC
- Redgrave and South Lopham Fen Ramsar

For further information on these sites, please see the [Conservation Objectives](#) and Information Sheets on [Ramsar Wetlands](#) which explain how each site should be restored and/or maintained.

Zones of Influence

As part of the work to inform the Norfolk RAMS evidence base 'zones of Influence' (ZOI) have been calculated following the collation and analysis of the Norfolk Visitor Survey data to determine the distances within which residents of new housing are likely to regularly visit relevant designated sites for recreation.

Table 1 shows the calculated Zoi but does not include all of the above listed designated sites, specifically the Ouse Washes, Overstrand Cliffs, River Wensum, Waveney and Little Ouse Valley Fens and Redgrave and South Lopham Fen. The calculated Zoi cover the breadth of Norfolk County encompassing all designated sites, consideration should be given to determine if the strategy could include the required visitor data collection and site monitoring to determine site specific mitigation where there are gaps in evidence.

Table 1: Zones of Influence

Area	European Designated Sites	Zoi (km)
Breckland sites	Breckland SPA Breckland SAC	26
Broads sites	The Broads SAC Broadland SPA	25
East Coast sites	Breydon Water SPA Winterton-Horsey Dunes SAC Great Yarmouth and North Denes SPA	30
North Coast sites	North Norfolk Coast SAC North Norfolk Coast SPA The Wash and North Norfolk Coast SAC	42
Roydon and Desingham	Roydon Common and Dersingham Bog SAC Roydon Common Ramsar Dersingham Bog Ramsar	12
Norfolk Valley Fens	Norfolk Valley Fens SAC	15
The Wash	The Wash SPA The Wash Ramsar The Wash and North Norfolk Coast SAC	61

Once the Zol have been finalised, it will be anticipated that any new residential development within an identified zone will constitute a likely significant effect (LSE) on the sensitive interest features of the above designated sites through increased recreational pressure, either when considered 'alone' or 'in combination'. The RAMS (or associated Supplementary Planning Document) will, once adopted, specify requirements for developer contributions via a per house tariff to an agreed and costed suite of measures which have been developed to mitigate impacts to these designated sites.

Consultation arrangements

It is recognised that a proportion of the residential allocations in your local plans will be coming forward as planning applications prior to the adoption of the Norfolk RAMS. In the interim period until the RAMS is in place and the necessary developer contributions are known, it is important that any recreational impacts from residential schemes such as these are considered in terms of the Habitats Regulations through a project level Habitats Regulations Assessment (HRA). All planning decisions should be able to show that impacts to designated sites can be adequately mitigated and this should be demonstrated through appropriate assessment. Those boroughs and districts with existing strategies should continue to follow their established process and seek consultation in accordance with agreed criteria.

Natural England has already developed a set of [Impact Risk Zones \(IRZs\)](#) which helps guide planning authorities on the types and scale of development that we should be consulted on. We advise that we should continue to be consulted in line with these arrangements (i.e. where there are other IRZs are triggered in addition to the Norfolk RAMS)

Once Zol have been agreed, Natural England will refine residential IRZ's for the above designated sites to align with the Norfolk RAMS project and capture new residential development which falls within the Zols shown in Table 1 above; these will relate to the following development types:

- New dwellings of 1+ units (excludes replacement dwellings and extensions)
- Houses in Multiple Occupancy (HMOs)
- Student Accommodation
- Residential care homes and residential institutions (excludes nursing homes)
- Residential caravan sites (excludes holiday caravans and campsites)
- Gypsies, travellers and travelling show people plots

We advise that the applications in scope for consideration should include all new applications as well as those with outline planning permission where this issue has not previously been assessed through the HRA process.

Once strategic mitigation measures are agreed and costed, we will write to you again, as this will enable affected development projects to contribute in a standardised manner. We will then update our Impact Risk Zones to capture the majority of new residential housing development in this way.

Approach to avoidance and mitigation measures for recreational disturbance

We have included within Annex A of this letter a suggested HRA record template which can be used to record the conclusions of both the Screening and Appropriate Assessment stages of HRAs for planning applications within scope of the Norfolk RAMS for which recreational disturbance to the above sites is the only HRA issue. The use of this template is not mandatory but we have provided it in an attempt to streamline the process and make it as straightforward and consistent as possible for the authorities involved in the RAMS.

¹ Panter *et al* (2016) *Visitor Surveys at European Protected Sites across Norfolk during 2015 and 2016*, Footprint Ecology sites

² Conservation of Habitats and Species Regulations 2017, as amended (commonly known as the 'Habitats Regulations'). Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process. The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

³ Taken from Jenkinson, S., (2013), *Planning for dog ownership in new developments: reducing conflict – adding value. Access and greenspace design guidance for planners and developers*

Green Infrastructure

Natural England recommends that large developments (50+ houses) include green space that is proportionate to its scale to minimise any predicted increase in recreational pressure to designated sites, by containing the majority of recreation within and around the developed site. The [Suitable Accessible Natural Green Space](#) (SANGS) guidance can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. Green infrastructure design should seek to achieve the Natural England Accessible Natural Greenspace Standards, detailed in [Nature Nearby](#), including the minimum standard of 2ha informal open space within 300m of everyone's home. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km¹ within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated 'dogs-off-lead' areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- to the long term maintenance and management of these provisions

To provide adequate mitigation onsite GI should be designed to provide a multifunctional attractive space of sufficient size to reduce frequent visits to sensitive sites. It should facilitate a variety of recreational activities whilst supporting biodiversity. Evidence and advice on green infrastructure can be found on the Natural England [Green Infrastructure web](#) pages. We also recommend the [Green Infrastructure Partnership](#) as a useful source of information when creating and enhancing GI.

Local Planning Authorities may also wish to consider to benchmark standards for accessible natural greenspace, the TCPA have published [Guides and Principles for Garden Communities](#), and Guide 7, Principal 9, references 40% green infrastructure as a target quantum. Whilst some larger housing allocations may not technically qualify for Garden Community status, nevertheless Natural England advises that this represents a quantum and quality standard which is aspirational in this context.

For individual schemes, Natural England would be happy to advise developers and/or their consultants on the detail of requirements at the pre-application stage through our charged Discretionary Advice Service, further information on which is available [here](#).

For any queries relating to the specific advice in this letter only please contact Victoria Wight using the details given below . For any new consultations, or to provide further information on this consultation, please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Victoria Wight
Norfolk and Suffolk Area Team

Email: victoria.wight@naturalengland.org.uk
Tel: 0208 2257617

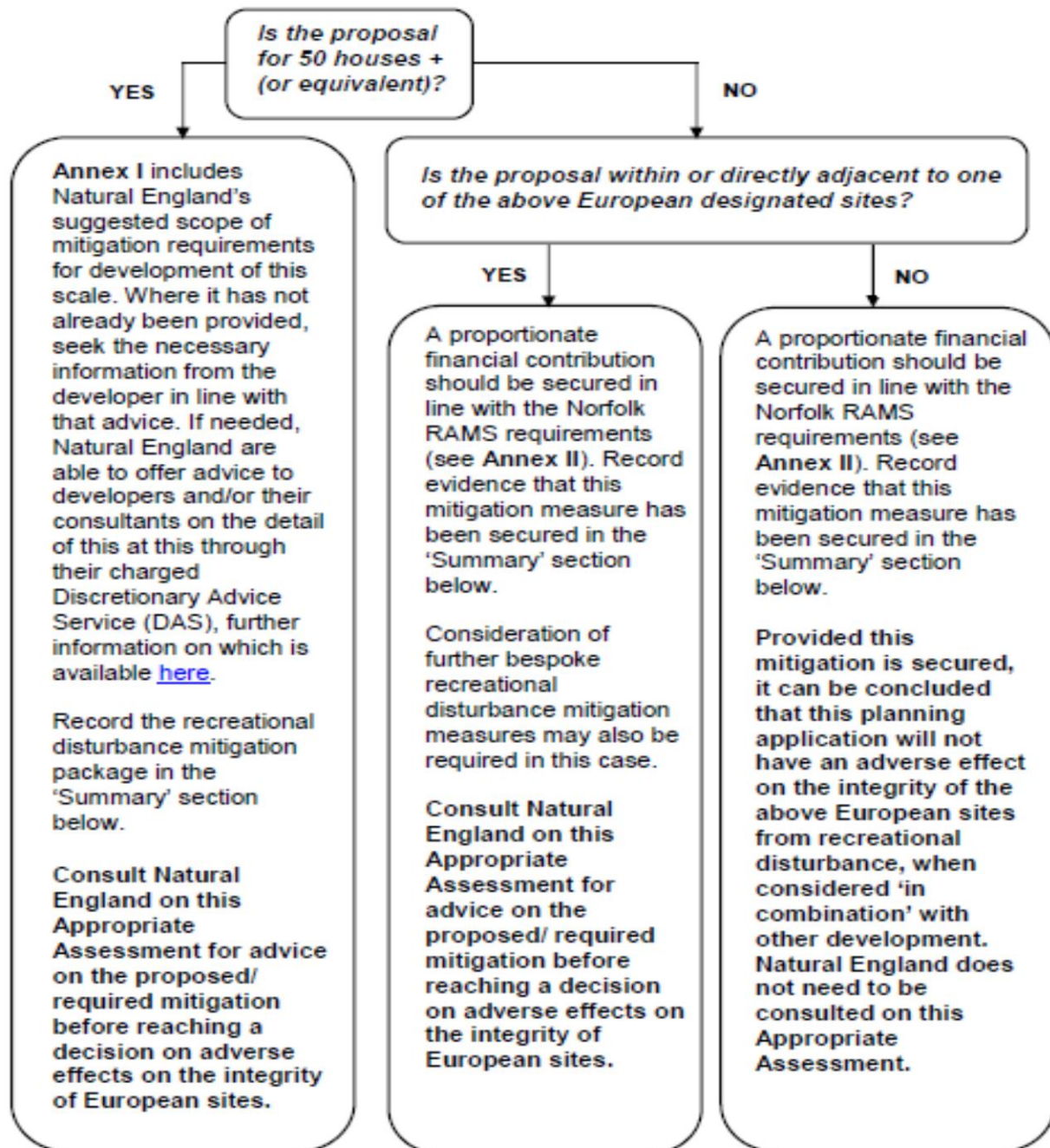
Cc: Sue Hooton, Essex Place Services

**Annex A: Norfolk Recreational disturbance Avoidance and Mitigation Strategy (RAMS)
Habitat Regulation Assessment (HRA) Record**

Application details	
Local Planning Authority:	
Case officer	
Application reference:	
Application description:	
Application address:	
Status of Application:	
Grid Ref:	
HRA Stage 1: screening assessment	
Test 1 – the significance test: Based on the development type and proximity to European designated sites, a judgement should be made as to whether the development constitutes a 'likely significant effect' (LSE) to a European site in terms of increased recreational disturbance	
<div style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p><i>Is the development within THE Zone of Influence (Zoi) for the Norfolk Rams with respect to the below sites</i></p> <ul style="list-style-type: none"> 20km Brecks Sites; Breckland SPA, SAC 25km Broads Sites; The Broads SAC and Broadland SPA 30km East Coast Sites; Breydon Water SPA, Winterton-Horsey Dunes SAC and Great Yarmouth and North Denes SPA 42km North Coast Sites; North Norfolk Coast SAC, SPA, Ramsar and the Wash and North Norfolk Coast SAC 12km Roydon and Dersingham Bog SAC and Ramsar 15km of Norfolk Valley Fens SAC 61km of The Wash; The Wash SPA, Ramsar and The wash and North Norfolk Coast SAC </div>	
<p>YES</p>	<div style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p><i>Does the planning application fall within the following development types?</i></p> <ul style="list-style-type: none"> New dwellings of 1+ units included in current site allocations and windfall (excludes replacement dwellings and extensions) Houses in Multiple Occupancy (HMOs) Student Accommodation Residential care homes and residential institutions (excludes nursing homes) Residential caravan sites (excludes holiday caravans and campsites) Gypsies, travellers and travelling show people plots </div>
<p>YES</p>	<div style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p>Conclude LSE. This proposal is within scope of the Norfolk Coast RAMS as it falls within the 'zone of influence' for likely impacts and is a relevant residential development type as listed above. It is anticipated that such development in this area is 'likely to have a significant effect' upon the interest features of the aforementioned designated site(s) through increased recreational pressure, when considered either alone or in combination. Therefore:</p> <ul style="list-style-type: none"> Proceed to HRA Stage 2: Appropriate Assessment to assess recreational disturbance impacts on the above designated sites Check IRZs to see whether recreational disturbance is an issue for non-coastal European sites or Sites of Special Scientific Interest (SSSIs). If so, this will also need assessing outside of this HRA form. </div>
	<p>NO</p>
	<div style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p>Conclude no LSE to the above designated sites in terms of recreational disturbance:</p> <ul style="list-style-type: none"> An Appropriate Assessment (AA) is not required where recreational disturbance to these sites is the only issue or recreational disturbance to these sites can be scoped out of any HRA covering other issues. Check IRZs to see whether recreational disturbance is an issue for non-coastal European sites or Sites of Special Scientific Interest (SSSIs). If so, this will also need assessing outside of this HRA form. </div>
	<div style="border: 1px solid black; border-radius: 15px; padding: 10px;"> <p>The proposal is outside the scope of the Norfolk RAMS. However, applications involving unplanned development or tourist accommodation (including holiday caravans and campsites) could still potentially have recreational disturbance impacts (and other impacts) on designated sites, including those listed above. In cases such as this, consult Natural England for bespoke advice before concluding no LSE.</p> </div>

HRA Stage 2: Appropriate Assessment

Test 2 – the integrity test: The applicant must provide sufficient evidence to allow the Appropriate Assessment to be made, which is the stage at which avoidance and/or mitigation measures can be considered



Summary of the Appropriate Assessment : To be carried out by the Competent Authority (the local planning authority) in liaison with Natural England (where necessary)

Summary of recreational disturbance mitigation package

[INSERT]

Conclusion

Having considered the proposed avoidance and mitigation measures above, [INSERT LPA] conclude that with mitigation the project will not have an Adverse Effect on the Integrity of the European sites included within the Norfolk RAMS.

Having made this appropriate assessment of the implications of the plan or project for the site(s) in view of that (those) site(s)'s conservation objectives, and having consulted Natural England and fully considered any representation received (where necessary), the authority may now agree to the plan or project under regulation 63 of the Conservation of Habitats and Species Regulations 2017.

Local Planning Authority Case Officer comments, signed and dated:

Annex I – Natural England’s recommendations for larger scale residential developments within the identified Norfolk RAMS zone of influence (50 units +, or equivalent, as a guide)

Developments of this scale should include provision of well-designed open space/green infrastructure, proportionate to its scale. Such provisions can help minimise any predicted increase in recreational pressure to the European sites by containing the majority of recreation within and around the development site boundary away from European sites. We advise that the Suitable Accessible Natural Green Space (SANGS) guidance here can be helpful in designing this; it should be noted that this document is specific to the SANGS creation for the Thames Basin Heaths, although the broad principles are more widely applicable. As a minimum, we advise that such provisions should include:

- High-quality, informal, semi-natural areas
- Circular dog walking routes of 2.7 km³ within the site and/or with links to surrounding public rights of way (PRoW)
- Dedicated ‘dogs-off-lead’ areas
- Signage/information leaflets to householders to promote these areas for recreation
- Dog waste bins
- A commitment to the long term maintenance and management of these provisions

Natural England would be happy to advise developers and/or their consultants on the detail of this at the pre-application stage through our charged Discretionary Advice Service (DAS), further information on which is available [here](#).

However, the unique draw of the above European sites means that, even when well-designed, ‘on-site’ provisions are unlikely to fully mitigate impacts when all residential development within reach of the coast is considered together ‘in combination’. We therefore advise that consideration of ‘off-site’ measures (i.e. in and around the relevant European designated site(s)) is also required as part of the mitigation package for predicted recreational disturbance impacts in these cases. Such measures are to be delivered strategically through the Norfolk RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Norfolk RAMS.

Annex II – Natural England’s recommendations for smaller scale residential developments within the identified Norfolk RAMS zone of influence (0-49 units, or equivalent, as a guide) which are not within/directly adjacent to a European designated site

Whilst the provision of well-designed open space/green infrastructure on site or contributions towards strategic green infrastructure in your district is to be welcomed for developments of this scale, we advise that consideration of ‘off-site’ measures (i.e. in and around the relevant European designated site(s)) is required as mitigation for predicted recreational disturbance impacts in these cases as a minimum. Such measures are to be delivered strategically through the Norfolk RAMS to make the sites more resilient to increased recreational pressures. A proportionate financial contribution should therefore be secured from these developments in line with the Norfolk RAMS.

Appendix 2 - Schedule of Representations

Extract of Report of Representations

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

Policy ENV4 (in relation to RAMS) Regulation 18 Responses

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Yardley, Mr Christopher (1218066)	LP688	Support	~I would also like to emphasize that the starting point for development should not be how to bolt on supposed 'net gain' in a specific development but to look to understand the impacts of the development on the existing site and wider biodiversity of the area ~I would also like to suggest that the policy be amended to include an additional key fourth point after 'all development proposals should' to the effect that the Council will engage with NGOs contributions towards the enhancement of biodiversity. Support additions to the proposed wording of the policy to enhance the value and meaning of the policy in line with NPPF guidance and wider community involvement.
ENV4	Spowage, Mr Richard (1216878)	LP326	General Comments	There is a need to emphasise councils duty to protect and enhance all wildlife and ensure suitable ecological information is supplied with any proposal to ensure correct mitigation is achieved both pre development, to prevent loss of species from sites, to post development ensuring long term protection and management of proposed mitigation. In addition the is need to ensure wildlife habitat mitigation is the primary aim and not part of a strategy of public open space which could be detrimental to target species. In addition mitigation needs to have regard for habitat connectivity seeking to link habitats and avoid fragmentation.
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided
ENV4	Bell, Ms Jane (1218416)	LP799	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly support the aims in paragraphs 8.22 & 8.23 and consider that those in paragraph 8.22 are of the highest importance. I am delighted to note that the 'provision of 'wildlife homes' is now an official stipulation with regard to ' development proposals'. However, I question the last paragraph (p. 96). If a 'designated site (etc.) may be adversely affected by a development proposal', why should the council consider a development application in the first place, if it is going to cause

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				inevitable, irreversible ecological damage? That is what 'adversely affected' means. pp . 129; 135 – 137 Par. 9.49, 9.50
ENV4	Duncan, Mr Phillip (1217309)	LP396	Object	Proposed Policy ENV4 This proposes that developer contributions will be required based on “the emerging Recreational Impact Avoidance and Mitigation Strategy57” . Footnote 57 confirms that “A Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (RAMS) is currently being commissioned collectively by the Norfolk Authorities and Natural England”. We do not consider it reasonable to propose a policy based on a study which has only just been commissioned, and for which there are no proposals for public consultation set out.
ENV4	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All developments should be subject to an environmental impact assessment to ensure they minimise their carbon footprint and an equality impact assessment to ensure they benefit all residents
ENV4	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Suggest a bold new environmental initiative by NNDC to aim to make North Norfolk a red squirrel only District by the end of this planning period. It would mean building on the start made by the Holkham estate and persuading land owners and residents on the land to the south to eliminate gradually the grey squirrel. This would for a start save the National Trusts woods at Felbrigg from the appalling damage inflicted on them by lack of control of grey squirrels, and is in tune with the HMG initiative to plant more trees. Other D.C’s and counties would follow this initiative but NNDC could take most of the credit.
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county’s biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV4	Dixon, Cllr Nigel (1218612)	ILP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Ensure layout and land usage creates maximum habitat and area connectivity for wildlife and promotes the recreation of ecosystems essential to address part of the climate change agenda. The Plan should incorporate a requirement to involve a recognised wildlife conservation or preservation authority to both advise on the layout of major sites and become a delivery and maintenance partner.

Individuals	Number Received	Summary of Responses (Policy ENV4)

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

Parish and Town Council's

No comments received

Organisations and Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Broads Authority (321326)	LP806	General Comments	8.23 – is the Landscape Character Assessment date correct? Should it be 2019? Could refer to Broads Landscape Character Assessment, Broads Landscape Sensitivity Study and Broads Biodiversity Action Plan too. • ENV4: is 'should' a strong term? Could it say something like 'are required to' or 'shall'? ENV5 for example says 'will'.	The LCA is dated 2018. Consider additional comments in the finalisation of the Plan

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Recreation Management Strategy is currently being researched and drafted. The strategy should be assessed to determine the suitability in mitigating the effects of increased recreational disturbance to North Norfolk's designated sites as a result of strategic growth. The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF. We support the recommendation to split Policy ENV 4 to cover designated and non-designated biodiversity assets at later iterations of the Plan and HRA. We strongly advise the Local Planning Authority instigates a suitably proportionate interim payment per dwelling in the absence of an established strategy to ensure new residential development and any associated recreational disturbance impacts on European designated sites are compliant with the Habitats Regulations, to address cumulative and in-combination impacts arising. We value the enhancement of biodiversity and geodiversity and the opportunity to create/improve habitats to support wildlife through biodiversity net gain. We encourage links to existing ecological networks to reduce fragmentation and facilitate wildlife movement on a strategic scale. The Local Planning Authority should develop an evidence base around biodiversity net gain that includes mapping assets and opportunities for habitat creation. Calculating biodiversity net gains and losses requires access to good data such as a phase 1 habitats survey that includes habitat condition. Where risks cannot be avoided or mitigated onsite, compensation may be required offsite for residual losses to achieve a biodiversity net gain outcome. In these cases, access to up to date ecological baseline data about any offset receptor site(s) will be needed. The mechanism of delivery should also be considered including the application of a metric to secure a net gain of biodiversity. We recommend CIRIA/CIEEM/IEMA 10 good practice principles when applying biodiversity net gain approaches. The approach to net gain should be monitored and reviewed. • Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The Plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p>	<p>within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Norfolk County Council (931093)	LP739	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: para 8.22 ‘A development with limited or no impacts on biodiversity should still seek to demonstrate a biodiversity net gain wherever possible. Remove ‘wherever possible’ – the word should already indicates it is optional. Where ever possible does not add anything to the sentence. Include ‘measurable’ net gain – so that we can record/request quantitative data on the loss and gains. Biodiversity net gain comes from ‘enhancement’ i.e. ‘restoring habitats not affected by construction – for example, an area of ancient woodland that is in poor condition’. The other, more common meaning of ‘enhancement’ is ‘providing environmental benefits over and above the measures required for mitigation’. Such enhancements do not constitute mitigation or compensation. Mitigation is carried out to limit and compensate for impacts, prior to any enhancement. (four steps of the mitigation hierarchy — avoid, minimize, restore and offset). Avoiding/protecting hedgerows, ponds etc. is mitigation, not net-gain. Creating an additional pond, woodland is net gain. - Recommendation: we would strongly recommend that text to the effect that ‘enhancement and mitigation measures should, where available, be evidence based’ is included. There is a wide range of published information available relating to mitigation and conservation strategies that must be incorporated into strategies to maximise chances of success. Para 8.23 Recommendations: Please remove references to the Norfolk Biodiversity Action Plans (BAPs). BAPs ceased to exist in 2012 with the publication of Biodiversity 2020: A strategy for England’s wildlife and ecosystem service. You might want to add a footer along the lines of ‘Priority habitats and species refer to those identified as being of principal importance in England, in Section 1 of the Natural Environment and Rural Communities Act 2006’.Comment: Soprano pipistrelle bats were identified as a UKBAP, but they are very common throughout Norfolk, so might not be a species requiring targeted conservation action. Other bat species would be a higher priority.- para 8.25 Replace ..."and replacement habitats may need to be provided to ensure no net loss of important habitats with ‘... and replacement habitats may need to be provided to ensure no net loss of important habitats.’ - specific to the policy wording On the 13th March, in the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the word ‘should. Recommendation: After ‘...ecological function’ add ‘and ecosystem services’. Bullet 2 add ‘habitat and ecosystem</p>	Noted:- Consider comments in the finalisation of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>functions'. Bullet 3 On the 13th March, in the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the words 'where appropriate. Plus replace wildlife homes with Nests and roosts. Remove also where ever possible from third para. footnote 56 Remove reference to Norfolk Biodiversity Action Plans as per previous comment. Could reference Section 1 of the Natural Environment and Rural Communities Act 2006. - second part of the policy should be updated in line with: Proposals whose principal objective to conserve /enhance biodiversity or geodiversity interests should not be given planning if it will result in significant detriment to nature conservation interests. I would suggest re-ordering the sentences: Development proposals where the principal objective is to conserve (add in) and/or enhance biodiversity or geodiversity interests will be supported in principle, unless Development proposals that would result in significant detriment to the nature conservation interests of nationally designated (and internationally designated?) sites will not be permitted. However, if proposals that would otherwise be granted as their principal objective is to conserve and/or enhance biodiversity will have a significant detriment to the nature conservation interests of nationally designated sites, they will not be permitted. Last para re proposal for an Ecological environmental impact assessment ...and PEA...A PEA refers to the survey of the site. The result of the survey(s) are presented in a PEAR (Preliminary Ecological Appraisal Report) or EclA (Ecological Impact Assessment). A PEA cannot be submitted as it is not a report, just the survey. Recommendation: add in '...to assess effects on all sites of nature conservation value..' PEAs should be undertaken at all sites of conservation value, not just for European Sites.</p>	
ENV4	Gladman Developments, Mr Craig Barnes (1217131)	LP282	General Comments	<p>Gladman largely support the requirements of Policy ENV4 which seeks to protect, support and enhance biodiversity. Gladman consider that the overall thrust of the Policy is consistent with the aims of the NPPF for sustainable development which seeks to secure net gains for the environment. The policy is sufficiently flexible providing opportunity for mitigation where direct or indirect adverse effects on designated sites are unavoidable. Proposed changes: To ensure that requested contributions required by the policy to address visitor impact on European Sites is consistent with national policy on planning obligations, Gladman consider that the policy should be reworded to make clear that the contribution required should be linked to the proposed development and the increased usage of these sites which is associated with the development.</p>	<p>Noted, Support welcomed - disagree (partly): Evidence contained within the emerging Recreation avoidance and mitigation Strategy and in line with advice from natural England will be used to inform future</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					iterations of the Plan and address impacts on European Sites
ENV4	CPRE (Mr Michael Rayner) (1204056)	LP299	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Therefore, greater recognition needs to be given to the role of rivers and the land around them in policy ENV 4. In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Our concerns arise from a generalised text which makes no mention of rivers at all, far less the importance of those in North Norfolk; and the overlay throughout of setting biodiversity activities solely through the prism of development and net environmental gain. See paragraph 8.21 in the draft as setting the scene: In 2018 the Government indicated that they intend to require developers how they are improving the biodiversity of a site, to deliver a biodiversity net gain. This is part of an ambition to embed the wider principle of environmental net gain in development. While this can be provide some opportunities it cannot, and need not, stand alone, as implied by the draft support text and policy. The developer will start with the development they want, and then see what can be bolted on in terms of biodiversity and net gain; and in the same way land for a new school or some other community benefit. This is different approach from starting from biodiversity as the core aim in the context of a wider long term strategy and its implementation. Much of has comes from NGO s. This is missing now in the draft, but was and is present in the Core Strategy. We add a footnote on advances over the past ten years, and hope that may be helpful in considering our proposals in providing illustrative draft texts, should you accept in principle the points we make. ..Proposal for EN 4 policy text. This starts with three points under the heading of “All development proposals should”: We suggest the addition of a fourth point, namely: 4. In addition to the above the Council will promote and engage with the contribution to be initiated and implemented by NGOs in the enhancement of biodiversity, both in terms of longer term biodiversity strategies and priorities for the District and their delivery. These aims will also support the assessment and value of the net gains offered by a</p>	Noted Consider comments in the finalisation of the policy

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

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					necessary to avoid the likely significant effects from in-combination impacts of residential development that is forecast across Norfolk. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan

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

Alternatives

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
ENV4	Mr & Mrs Johnson (1215700)	AC028	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ENV4. - Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided	Comments noted: This comment repeats the support ENV4 made against the First Draft Local Plan (Part 1).

Regulation 19

New section on Recreational impacts to follow ENV4 version 3 final for PPBHWP -

Internationally protected habitats and species, Recreational Impact Avoidance and Mitigation.

Residential and tourist related development proposed have the potential to result in a significant increase in recreational disturbance at the Norfolk Habitats Sites. Habitats Sites, include Special Protection Areas (SPAs), Special Areas of Conservation (SACs), European Marine Sites, but also include and Ramsar sites (wetland sites designated to be of international importance under the Ramsar Convention) and *candidate* sites. These represent those areas with the highest level of designation for wildlife interest in Europe and ensuring that their protection objectives are not compromised is of paramount importance.

Within North Norfolk, such sites include the North Norfolk Coast SAC/SPA, the Wash and North Norfolk Coast SAC and European Marine Site, Overstrand Cliffs SAC, Winterton Horsey Dunes SAC, the Norfolk Valley Fens SAC, the River Wensum SAC (one of the best examples of a chalk river in the country) and the Broads and Broadland SAC and SPA.

All net residential development and tourism accommodation that is likely to affect the integrity of Habitats Sites, will be required to contribute towards mitigation measures identified in the RAMS (or any subsequent Supplementary Planning Document) through the payment of a per dwelling (or equivalent) developer contribution¹ and for larger scale proposals of 50 units plus through the provision of onsite enhanced green infrastructure, EGI, or contributions towards strategic green infrastructure (as identified as strategic opportunity areas in the Rams Strategy or the though the NNDC Green Infrastructure Background paper, or any subsequent update or supplementary planning document). Such enhanced green infrastructure is in addition to any local open space policy requirements identified in ENV7 and should be at such a proportionate scale and standard, as outlined in the GI/RAM Strategy and be able to divert and deflect visitors from Habitat sites. Such green infrastructure is often referred to as Suitable Alternative Natural Greenspace (SANGS). SANGS are usually one area of an alternative attractive semi-natural environment but in the context of the Norfolk GI/RAMS, EGI is proposed as an alternative to a SANG and can incorporate a network of open spaces, permissive routes and natural or semi-natural environments across a given area.

In exceptional circumstances, it may be permissible to identify and implement bespoke mitigation measures in perpetuity to ensure compliance with the Habitats Regulations. Measures required to mitigate the impacts of recreational disturbance on Habitats Sites will be delivered as detailed in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (RAMS) through a project steering group via the Norfolk Strategic Framework.

The Local Plan is subject to a Habitat Regulation Assessment *and a final Assessment is in preparation.* The *interim HRA* indicates that the proposed housing growth, in North Norfolk and in combination with that planned across the county, will increase the number of recreational visitors to many of the important wildlife sites in the District. If left unmitigated this has the potential to have significant adverse impacts resulting from recreational disturbance. The policy and RAMS strategy is required to enable growth in the District through the implementation of measures to avoid adverse effects on

¹ Strategy allows for appropriate review of the charge to reflect inflation and any changes in mitigation measures required through the monitoring process.

the integrity of Habitats Sites and comply with the conservation of Habitats and Species Regulations 2017(as amended).

ENV4a Impacts on Internationally protected habitats and species, Recreational Impact Avoidance Mitigation Strategy

In order to avoid or mitigate the potential adverse impacts on Habitat Sites from recreational pressure, all residential and tourist related development are required to contribute towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (RAMS), through the provision of :

1. a tariff based per dwelling contribution (or equivalent);and
2. proposals of 50 dwellings plus are required to:
 - provide onsite Enhanced Green Infrastructure, and or
 - Contribute towards strategic green infrastructure as identified as strategic opportunity areas in the RAMSs Strategy or the though the NNDC Green Infrastructure Background paper (or any subsequent update or supplementary planning document).

Provision should meet Enhanced Green infrastructure quality Standards as set out in the Green Infrastructure Recreational Impact Avoidance and Mitigation Strategy and any subsequent SPD

Contained in ENV5 Green Infrastructure

Policy ENV5

Text and policy to be updated to include supporting wording to the suitable provision of enhanced Green Infrastructure and the quality standards

Text to be added to the GI section text

In line with the Norfolk Recreational Impact Avoidance and Mitigation Strategy, RAMS enhanced green infrastructure is to be incorporated into appropriately sized proposals. Development should seek to maximise opportunities for the restoration, enhancement and connection of the District's green infrastructure network throughout the lifetime of the development, both on-site and for the wider community and as identified in the Norfolk GI/RAM Strategy and North Norfolk Green infrastructure Background paper or any subsequent SPD.

Enhanced green infrastructure is in addition to any local open space policy requirements identified in ENV7 and should be at such a proportionate scale and standard, as outlined in the GI/RAM Strategy and be able to divert and deflect visitors from Habitat sites. Such green infrastructure is often referred to as Suitable Alternative Natural Greenspace (SANGS). SANGS are usually one area of an alternative attractive semi-natural environment but in the context of the Norfolk GI/RAMS, EGI is proposed as an alternative to a SANG and can incorporate a network of open spaces, permissive routes and natural or semi-natural environments across a given area

Enhanced Green Infrastructure should be incorporated into to existing open spaces and or provided through opportunities for new EGI provision and specific EGI project/target areas, known as strategic

opportunity areas in the GI/RAM study. Collectively this aligns with the wider Local Plan objectives and in particular objective 6.6 where the aim is to provide improved open space provision, access and connectivity across the Districts network of green infrastructure in order to ensure it functions as a strategic multi- functioning network, facilitates increased walking and cycling, improves the accessibility of new homes and contributes to health communities as well as deflecting pressures and avoiding adverse impacts on the existing Habitat Sites from recreational pressure.

In line with the Norfolk Recreational Impact Avoidance and Mitigation Strategy proposals of 50 dwellings plus are required to:

- Provide additional Enhanced Green infrastructure as identified in the Norfolk Green Infrastructure & Recreational Impact Avoidance and Mitigation Strategy and any subsequent SPD.

Site allocation policies to include updated text as standard in all allocations

Following consultation with Natural England, a Norfolk-wide GI and Recreational impact Avoidance and Mitigation Strategy (RAMS) *is being prepared* (~~has been prepared~~) to include all Habitats Sites. The strategy identifies where recreational disturbance is happening and the main recreational uses causing the disturbance. New residential development that is likely to affect the integrity of the European sites will be required to contribute towards the implementation of the mitigation. It is considered that this development allocation will be required to pay for the implementation of mitigation measures identified in the RAMS (or any subsequent Supplementary Planning Document in order to protect the sites. *(Update on finalisation of evidence base and strategy)*)

Add to all site allocations

Appropriate contributions will be secured towards mitigation measures identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (RAMS)

Note it is also intended where identified to incorporate into the Local Plan site allocations sections / relevant town strategies the identified Strategic Opportunity Areas and relevant Green infrastructure opportunities identified to date in the Green Infrastructure topic paper.

Developer contributions policy.SD5

Update item 3 in policy covering the RAMS contribution

Developer contributions will be required to secure infrastructure which is necessary to:

Mitigate visitor impact on ~~Europe sites~~ Habitat Sites in line with the Norfolk Green Infrastructure and Recreational Avoidance Strategy.

Add into ENV 4 – Biodiversity and Geology

Where appropriate, contributions from developments will be secured towards mitigation measures as identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (RAMS).

This page is intentionally left blank

Local Plan Draft Policy Approaches to the Environment

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse a number of policy approaches concerning the natural and built environment.

Recommendations: **It is recommended that Members endorse the revised Policies below, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager:**
ENV 1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads;
ENV 2: Protection & Enhancement of Landscape & Settlement Character;
ENV4: Biodiversity & Geology;
ENV 5: Green Infrastructure & Public Rights of Way;
ENV 6: Trees, Hedgerows & Development;
ENV 9: High Quality Design;
ENV 10: Protection of Amenity;
ENV 11: Protecting and Enhancing the Historic Environment;

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 Caroline Dodden, Senior Planning Officer, 01263 516310 Caroline.dodden@north-norfolk.gov.uk James Mann Senior planning Officer, 01263 516404 James.mann@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 **The purpose** of this report, is following a review of regulation 18 consultation feedback, to seek Members endorsement of a number of emerging policies that address matters concerning the natural and built environment in regard to future Plan-making ahead of Regulation 19 consultation and the submission of the Plan.

2. Background and Update

2.1 These policies, along with the other identified Environmental Policies, will form the policy framework which will protect and enhance the natural environment within the District and substantially form the environmental section of the emerging Local Plan. Policies ENV3 and & 7 which cover areas such as Heritage & Undeveloped Coast and Open space / Local Green Spaces have already been endorsed at previous working parties. provision

2.2 Since the Regulation 18 consultation further changes have taken place with regard national policy. Areas around biodiversity net gain have been further clarified in national policy and guidance and the government continue to make changes around the approaches that LPA's should be taking in regard Design. These and other changes are reflected in the discussion and revised approaches outlined below.

2.3 The purpose of ENV1 is to ensure that the statutory duty and appropriate high level of protection is given to these designated landscapes through conservation and enhancement of the defined special qualities of the Norfolk Coast Area of Outstanding Natural Beauty and the Broads

2.4 The purpose of ENV2 is to ensure that development proposals reflect the defining and distinctive qualities of the varied landscape character areas, their key characteristics and valued features and the character, appearance and integrity of the historic and cultural environment of North Norfolk.

2.5 The purpose of Policy ENV4 is specifically to protect and enhance biodiversity and geology. The district contains a wealth of biodiversity and natural environmental assets ranging from protected species and International and European designated sites, through to nationally and locally designated sites. The Council has statutory duties to protect these and the policy seeks to do this alongside the important aim of delivering improvements through habitat creation or enhancement after avoiding and mitigating harm by adopting an approach of biodiversity net gain.

2.6 Purpose of ENV5 is to safeguard, retain and enhance the network of green infrastructure within the district. This policy has been informed by the contents of the Green Infrastructure Background Paper and the Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy. Both of these documents set out a strategic approach towards improving the existing green infrastructure network and will ensure the right types of green spaces are provided and enhanced, which in turn, will provide the greatest benefit.

2.7 Purpose of ENV6 is to protect trees, hedgerows, woodland and other natural features from harm, including loss and deterioration and to provide compensatory replacement provision where necessary. Many trees in the district have protected status, under the designation of Tree Preservation Orders (TPO) or by being situated within a Conservation Area. The Policy also now seeks to extend further to all natural landscape features in order that any harm or loss to any unprotected features is considered from the outset.

- 2.8 Purpose of ENV8 is to protect, enhance and promote Public Rights of Way and access and to ensure that the creation and maintenance of a continuous signed and managed route around the English coast is not hindered.
- 2.9 The purpose of Policy ENV 9 seeks to set out the overarching design principles to which all development within the District will need to comply with. The policy provides the hooks for the guidance within the national design guide and existing national guidance as well as a future updated North Norfolk Design Guide to be given weight in the decision making process. The policy also seeks to stand on its own and will help to deliver and facilitate high quality design within the District.
- 2.10 The purpose of Policy ENV10 is to maintain, protect and promote the amenity of the District's communities in order to ensure that all new development and existing residents benefit from a good standard of amenity. The policy is considered to provide further hooks for the guidance within the design guide to be given weight in the decision making process. There are a number of criteria within the policy focusing on the following:
- Provision and protection of useable and secluded private amenity space;
 - Privacy, outlook and overlooking;
 - Overshadowing and the loss of daylight and/or sunlight;
 - Forms of nuisance and pollution (noise, air, light etc.).
- 2.11 The purpose of ENV11 is to ensure that North Norfolk's built heritage is conserved and where possible, enhanced. The policy sets out the requirements in order to achieve this for the range of designated and non-designated heritage assets.

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 this group of draft policies is contained within **Appendix 1** to this report and summarised below. Overall, the number of responses to the policies was quite limited, but the respondents did raise some key issues. The comments are summarised below for each draft policy:

Policy ENV1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads

- 3.2 **Individuals:** Three objections and two responses in support were received. Objections focused around the broad approach the Council should be taking in relation to development in the AONB. One objected to the policy in that suitable development necessary to meet identified local housing need that does make a contribution to the natural beauty and character of the area should be allowed in the AONB. Remaining objections focused on the principle of development in the AONB, due to the impact on affordability of house prices and disagreed with the premise of allocation in the AONB throughout the plan. The definition of major development within the AONB, was questioned in relation to the promotion of specific proposals. Support was received around the positive attitude that the policy promotes suggesting that it should go further and allow local needs housing in principle.
- 3.3 **Parish & Town Councils:** No comments received.
- 3.4 **Statutory Bodies and Organisations:** There was broad support for this policy, references to 'opportunities to enhance' biodiversity were sought. Bodies such as the

Broads Authority and Norfolk Coast Partnership thought greater emphasis could be placed on developers to consider the special qualities of the landscape in any proposals and sought the policy approach to be strengthened. The Environment Agency provided general comments covering the whole environment section and welcomed the approach set out in ENV1.

Policy ENV2 Protection & Enhancement of Landscape & Settlement Character

- 3.5 Individuals. No substantive issues were raised. One respondent requires clarification on the scope of LCA & LSS.
- 3.6 Parish & Town Councils: No comments received.
- 3.7 Statutory Bodies and Organisations: Seven responses were received including detailed support and general advice from Natural England, Broads Authority, the Norfolk Coast Partnership, Duchy of Cornwall and RSPB. Many acknowledged the importance of protecting landscape and settlement character. Concerns raised included those around the being too vague in the wording, specifically in relation to the use of 'where possible', 'must strive' and bullet point 2, which referred to gaps between settlements. It was suggested that these need to be clearly defined and justified. It was noted that in order to align with national policy the approach should also be formulated in such a way that development would not be limited where landscape constraints can be addressed by appropriate mitigation.
- 3.8 Historic England broadly supported the policy and the production of the updated Landscape Character Assessment, LCA. Their objection sought clarification on the terminology used suggesting updating the reference to Historic Parks and Gardens to Registered Parks and Gardens. They also cautioned against the continuation of using bullet 8, commenting that the setting of a heritage asset, is more than just visual links, can change over time and encompasses other factors such as noise, odour, light and how an asset is experienced and as such is covered in updated reference to Registered Parks and Gardens.

Policy ENV4: Biodiversity and Geology

- 3.9 Individuals: Four responses of support, three general comments and two objections were received. There is general support for the policy approach, where a number of the comments focus on how the policy could go further to protect biodiversity; that EIAs should be required on all development and that suitable information should be submitted during the pre-application stage to ensure mitigation is achieved. One comments that no development should be permitted on sites that currently provide biodiversity and where development would have an adverse impact on a designated site, while another recommends that a wildlife conservation or preservation authority should advise on the layout of major sites and become a delivery and maintenance partner.
- 3.10 Parish & Town Councils: No comments received.
- 3.11 Statutory Bodies and Organisations: Five responses of support, four general comments and one objection. The Policy approach was largely supported, with some statutory bodies requesting clarifications around some background documents and seeking stronger wording around the requirement to provide enhanced biodiversity and habitat creation on and off site, to better link the policy to the Plans Vision. The term 'measurable net gain' should be referred to in order that a monitoring strategy can be developed to measure biodiversity net gain over the Plan period. The

adoption of a strategic approach to mitigate recreational visitor impacts to European sites was welcomed by Natural England and should be set out further in the policy following finalisation of the joint Norfolk study.

- 3.12 Greater recognition around the contribution and opportunities rivers provide in ecological network was also sought. Developers largely supported the approach as being consistent with the NPPF in providing flexibility so as not to limit development where constraints can be managed and addressed through appropriate design and mitigation, but suggested that in places it could be more prescriptive around the planning obligations, seeking also to limit contributions to be site specific.
- 3.13 A late representation was also received from the Norfolk Geodiversity Partnership requesting the inclusion of further geological details within the policy justification, including mention of two County Geodiversity Sites (CGS) and forty-two candidate CGS.

Policy ENV 5: Green Infrastructure

- 3.14 Individuals: Two responses of support, two general comments, and three objections were received. There is general support for the aims of this policy. The objection responses are predominantly concerned with increasing the provision of sustainable active and GI travel opportunities as part of new developments; as do those in support. One objection raises concerns over inconsistencies with this policy and the GI Background Paper. Respondents also note the need for a holistic approach to GI in terms of connectivity of wildlife corridors, green/POS, and [sub] urban/non-built areas. The need for testing capacity for onsite provision and clearly defining GI is also noted.
- 3.15 Parish & Town Councils: One response of support and one general comment were received. There is general support for the policy, however respondents noted that they would like to see certain areas of the policy strengthened. These focussed on improving connectivity between areas of green and Public Open Space provision and how the movement of people and vehicles might be improved in relation to public transport and easing existing levels of congestion.
- 3.16 Statutory Bodies and Organisations: Three responses of support and two general comments were received. There is general overall support for this policy from consultees. All respondents welcome and recognise the need for GI as a central tenet for new developments.
- 3.17 Consultees noted that PROW might be included as a location for offsite enhancement in the policy's last paragraph. It was also noted that the aims of this policy should be measurable and consistent to allow the development of a monitoring framework. Developers were keen to point out that too heavy a reliance on GI might raise issues of viability in line with NPPF Paragraph 34, with one noting the potential difference in implications for Outline/Reserved Matters and Full applications.

Policy ENV 6: Trees & Hedgerows

- 3.18 Individuals: One response in support and one general comment were received. Respondents generally support this policy and highlight the importance of trees and hedgerows to enhance biodiversity and provide continuous habitat areas across the County. No substantive issues were identified.
- 3.19 Parish & Town Councils: No comments received.

- 3.20 Statutory Bodies and Organisations: Two responses in support and two general comments were received. There is good support for this policy as all respondents recognise the importance of trees and hedgerows. However, respondents note areas for strengthening this policy, particularly in relation to offering protection to trees & hedgerows which are not currently protected but are considered important landscape and biodiversity features. The EA also promotes the protection and planting of trees alongside rivers to keep water temperatures cool and provide habitat for a range of species. One respondent noted the need for clarification of the term 'public benefit' to allow for flexibility for developers within the policy.

Policy ENV 8: Public Rights of Way

- 3.21 Individuals: One response in support and one objecting. The supporting comment agrees with the principle, but raises concerns over the potential impact on certain areas of wildlife from disturbance by inappropriate behaviour, noise and dogs and suggests that consultation with the Norfolk Wildlife Trust and other experienced organisations is essential in developing policy. The objection relates to the promotion of a site in Roughton that could provide links from the site to footpath (Roughton FP15).
- 3.22 Parish & Town Councils: One comment of support from Cley Parish Council who would like to see better connectivity for Public Rights of Way, using permissive paths, footways and new PROW wherever possible to connect and link to adjoining parishes, National Trails and local services. All new development should enhance the current PROW network whilst creating new off road opportunities for walkers, cyclists and horse riders.
- 3.23 Statutory Bodies and Organisations: Three supporting comments and one general comment. In finalising the policy it was suggested that further commentary could be added regarding the inclusion of PROWs in new development or contributions made for improvements to existing PROWs.

Policy ENV 9: High Quality Design

- 3.24 Individuals: Six representations were made during the consultation period. The general consensus was in support of the drafted policy and that it should not be weakened. Some raised concern that the design standards would increase development costs, whilst others did not think it had gone far enough.
- 3.25 Parish & Town Councils: No comments were received through the Regulation 18 Consultation period.
- 3.26 Statutory Bodies and Organisations: Ten comments were received from Statutory Consultees in regard to Policy ENV 9 and were, again, generally supportive of the policy. Gladman commented that the policy should be more flexible to ensure that small scale developments do not need to comply with all of the requirements set out in the policy. Historic England requested more detail in the supporting text in regard to local materials and vernacular. Norfolk Police requested specific reference be made to Secure by Design. Pigeon objected to giving the Design SPD Development Plan status, as this has not been subject to examination.

Policy ENV 10: Protection of Amenity

- 3.27 Individuals: Two responses of support and one objection were received. The issue of buffers between new residential developments and highway impacts is noted as a means of increasing residential amenity and reducing noise pollution. The redevelopment of farm buildings for second homes/holiday lets adjacent to people's homes was also raised as an issue of residential amenity by the objector.
- 3.28 Parish & Town Councils: One general comment was received from Sheringham Town Council stating that lighting in new developments should be limited to that necessary for security and that consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas and sky-lights in recognition of Dark Skies.
- 3.29 Statutory Bodies and Organisations: Two responses of support and two general comments were received. This policy is generally supported by respondents. Additional areas of policy development were highlighted as being; cross-referencing with Broads Authority policies, considering the impact of light pollution and Dark Skies on amenity and biodiversity and the inclusion of water pollution and maintenance of water quality being included in bullet point 8 of the policy. Respondents also noted the need for clarification and consistency between the policy and the North Norfolk Design Guide and PPG. The EA suggest more emphasis on addressing and protecting against odour pollution from new developments at the design stage rather than resolving at the decision stage.

Policy ENV 11: Protecting and Enhancing the Historic Environment

- 3.30 Individuals: One response in support, two general comments, and one objection received. There is general support for this policy. No substantive issues were raised. General comments support the use of Conservation Area appraisals and suggest an increased emphasis/protection of existing historic buildings. The objector references specific advice given about a particular application.
- 3.31 Parish & Town Councils: One general comment received. The respondent asserted that more should be done to preserve heritage assets such as flint walls.
- 3.32 Statutory Bodies and Organisations: Two general comments, one response in support and one objection were received. The policy approach is generally supported, but respondents note potential changes to the policy could include reference to a 'shared Conservation Area' with the Broads Authority, and more clarity/accuracy in implementing the policy by restructuring the layout of the wording through the use of sub-headings. The use of a local list is welcomed and it is suggested that the criteria should form an Appendix to the policy. One respondent notes the cumulative design impact of more modern buildings/materials on heritage assets and whether this should be considered in this policy.
- 3.33 Historic England confirm that the policy is broadly consistent with the tests for harm in the NPPF. However, they strongly advise that differentiation ought to be made between the different Listed Building grades as to the acceptable levels of harm associated with them as laid out in the NPPF (Grade II – exceptional, Grade II*/Grade I – wholly exceptional). They suggest the creation and implementation of a policy framework for addressing heritage at risk. They would also like to see more detail in relation to archaeology.

3.34 Subsequently, through the formation of the Council's Historic Environment Topic Paper further feedback has been provided by Historic England. The final iteration of the policy wording, along with the findings of the Historic Environment Topic Paper, will be subject to a Statement of Common Ground between Historic England and North Norfolk District Council.

4. National Policy

4.1 The revised National Planning Policy Framework (NPPF) was published in February 2019, which is supplemented by the National Planning Practice Guidance (PPG), an online resource providing guidance on the NPPF's implementation. Section 15 of the NPPF covers conserving and enhancing the natural Environment. Some of the main relevant paragraphs of the NPPF are reproduced for the benefit of contextual information and discussion:

NPPF paragraphs:

- **170.** Planning policies and decisions should contribute to and enhance the natural and local environment by:
 - (a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - (b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
 - (c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
 - (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;
 - (e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
 - (f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.
- **171.** Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework 53 ; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- **172.** Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important

considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
 - (b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
 - (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.
- **173.** Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 172), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and Biodiversity.

- **174.** To protect and enhance biodiversity and geodiversity, plans should:
 - (a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - (b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- **175.** When determining planning applications, local planning authorities should apply the following principles:
 - (a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - (b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - (c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.

- **176.** The following should be given the same protection as habitats sites:
 - (a) potential Special Protection Areas and possible Special Areas of Conservation;
 - (b) listed or proposed Ramsar sites; and
 - (c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.
- **177.** The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.
- **180.** Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:
 - a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life⁶⁰;
 - b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and
 - c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

4.2 Updated Design Guidance including the National Design Guide:

- Following the Regulation 18 Consultation, in October 2019, the Ministry for Housing Communities and Local Government produced a National Design Guide¹, which provides detail on the ten characteristics of good design. The components of ‘good design’ within the National Design Guide are made up of the following 10 characteristics: Context, Identity, Built form, Movement, Nature, Public spaces, Uses, Homes and buildings, Resources and Lifespan.
- Homes England ‘Building for life’ has been superseded by ‘Building for a Healthy Life’ which sets out a toolkit for neighbourhoods, streets, homes and public spaces. It is considered that this update is also broadly consistent with the principles as set out in Policy ENV 9. The emerging draft Norfolk Strategic Framework sets out that all Local Authorities should make reference to this guidance.

4.3 Reference should, therefore, be made to these pieces of updated guidance in order to ensure that these provide an additional guidance base for Policy ENV 9.

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

5. Conclusions for Policy ENV 1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads

- 5.1 In response to the feedback it is considered that there is scope to provide further clarity strength to the policy and provide guidance in order to ensure proposals consider the special qualities of the landscape and add clarity to the interpretation of national policy and align with ENV2. The introductory and justification text to the policy section has been amended to reflect this and the policy is amended as in **Appendix 2**.
- 5.2 The policy is updated to correctly reference the Broads and to ensure clarity around the considerations necessary around the determination of the appropriateness of development in line with the requirements of the NPPF and local considerations, including the landscape character SPD and objectives of the AONB Management Plan. Clarity has been brought by removing the words where possible and the greater use of specific criteria. The considerations around Major development and exceptional circumstances are now also explained in the supporting text but also within the policy. Clarity is brought to the policy by ensuring all development proposals whether considered major or are of a smaller nature must demonstrate how they meet a range of criteria which are informed by national policy and additional local considerations which provide the robust evidence. The policy is one that considered landscape primarily so the specific reference to need is removed however a proposal still must demonstrate its relevance to the economic, social and environmental wellbeing of the area, and how it relate to sustainability including being appropriately located. Such demonstration would include need. The wording is also aligned to policy SD 2 – Community Development where the policy approach supports community led development proposals as long as they meet a number of criteria including evidence of need.

6. Conclusions for Policy ENV 2: Protection & Enhancement of Landscape & Settlement Character

- 6.1 In response to the feedback it is considered that there is scope to undertake some minor changes and clarifications in order to ensure ambiguity is removed, strengthen the policy wording so that there is a clear purpose for consideration and enhancement and acknowledge that development is not limited where landscape constraints can be addressed through appropriate mitigation. National policy places an emphasis on protecting but also enhancement to the valued features of the landscape. The introduction and policy justification text has been amended to reflect this and provide clarity and align with the Council's Landscape Character and Landscape Sensitivity SPD's which provide the evidence base and basis for proposals and decision making.
- 6.2 Members will also be aware that the Draft Landscape Character and Sensitivity Assessments SPD have also been updated following consultation and finalised ahead of adoption. As such references are updated throughout the Local Plan.
- 6.3 Criterion 2 is removed as it is not substantiated across the District. That is not to say settlement gaps and coalescence should not be and will not be respected. Various Landscape Characters identify the importance of gaps as a defining feature and the amended policy provides appropriate guidelines and considerations of such gaps in line with the appropriate Landscape character eg coastal shelf and historic estates.
- 6.4 Criterion 8 is removed as suggested and agreed with Historic England. The setting of Sheringham Park remains a wider consideration, and it is not necessarily limited or defined on the basis of a particular line or the visual area set out in the Zone of Visual Influence identified by the National Trust in 2005/6. The setting is encapsulated in the broader scope of registered parks and gardens in the policy and

the approach set out in ENV11-Protecting and enhancing the Historic Environment. The panoramic views, wider parklands and semi natural habitats of both Sheringham Park and Felbrigg Hall are also included in the key characteristics and valued features of the Woodland Glacial Ridge landscape character type.

- 6.5 Various minor amendments are also made to the criteria of the policy in order to link with and align to other policies in the Plan. A positive element is introduced through the requirement for proposals to demonstrate how they enable a scheme to integrate into the landscape and where they are considered to have potential for adverse impacts defined Landscape Character to be informed by a Visual impact assessment undertaken to current best practice.

7. Conclusions for Policy ENV4: Biodiversity & Geology

- 7.1 In response to the consultation comments set out in Section 3, there was general support for the aims of the Policy. As a result of the feedback and that national policy and guidance has continued to evolve since the Policy was first written, the wording has been strengthened around the requirement to provide enhanced biodiversity and habitat creation and the term 'measurable' has been added in order that a monitoring strategy can be developed to measure biodiversity net gain over the Plan period. For legibility, the Policy has been re-organised to separate out the varying levels of nature conservation designations.

- 7.2 The reference to Recreational Avoidance Mitigation Strategy has been updated to reflect the emerging evidence and the addition of a separate policy in this area.

- 7.3 The updated policy wording is set out in **Appendix 2**.

8. Conclusions for Policy ENV 5 / ENV8: Green Infrastructure, and Public Rights of Way

- 8.1 Consultation feedback showed broad support for the aims of Policy ENV 5 to establish a strategic approach for the conservation and provision of Green Infrastructure across the district. As a result of feedback and the fact that Public Rights of Way form part of Green Infrastructure, the wording of draft Policy ENV 8: Public Rights of Way, has been incorporated in to Policy ENV5.

- 8.2 In addition the policy has been updated to also reflect the requirements for the provision of enhanced Green infrastructure as part of the Norfolk Green Infrastructure and Recreational Avoidance Strategy.

9. Conclusions for Policy ENV 6: Trees & Hedgerows

- 9.1 It is clear from the consultation feedback set out in Section 3, that there is generally good support for this Policy. One respondent did comment that the policy should be strengthened, particularly in relation to offering protection to trees & hedgerows that are not protected, but are considered important landscape and biodiversity features. Given the NPPF's advice on protecting valued landscapes, it is considered that the presumption of this policy can be strengthened to include the need to take account of the harm or loss of unprotected, but nevertheless, important natural landscape features. This approach will also complement the overall suite of Environmental Policies.

- 9.2 A key theme of the NPPF relates to conserving and enhancing the natural environment and given that in 2019, the Council declared a Climate Emergency and

launched a Tree Planting Scheme with the aim of planting 110,000 trees in 4 years, it is considered that the Policy should reflect this proactive approach by incorporating a positive statement at the start of the Policy to encourage and support new tree planting across the district to mitigate against the impacts of climate change and to enhance the character and appearance of the locality.

- 9.3 It is concluded that no major alterations to the draft policy are proposed, but that some minor amendments to add or omit wording, for example, including references to woodland, be incorporated in the next iteration of Policy ENV 6, which is set out in **Appendix 2**.

10. Conclusions for policy ENV 9: High Quality Design

- 10.1 In response to the consultation comments set out in Section 3, there was general support for the aims of the Policy. As a result of the feedback, a number of additional references have been made within the policy to relate, primarily, to guidance that has been updated since the Regulation 18 Consultation, primarily in relation to the National Design Guide and additional supporting guidance, primarily the 'Building for a Healthy Life' guidance.

- 10.2 Amendments were made to the policy to reflect this updated guidance and make reference to the 'national Design Guide', 'Secured by Design', 'Building for a Healthy Life' and to differentiate between major and minor development.

- 10.3 It is concluded that no major alterations are proposed, but that the minor amendments, as discussed above, are incorporated in the next iteration of Policy ENV 10, as set out in **Appendix 2**.

11. Conclusions for Policy ENV 10: Protection of Amenity

- 11.1 There is general support for this Policy. Particular concern was raised regarding the use of large areas of glazing, sky-lights and artificial light. The former two are technically design matters, but along with the latter issue, they are referred to in the policy justification at paragraphs 8.80 – 8.82. This, firstly, highlights these design issues and goes on to say that special attention should be paid to the lack of artificial light within Norfolk Coast AONB and the two locations in the district that have Dark Sky Discovery Site status and secondly, signposts to further guidance regarding this matter within the National PPG. Artificial lighting is referred to specifically in this policy wording and also, in Policy SD 13: Pollution & Hazard Prevention & Minimisation. In addition, this other policy also refers to water quality, which is raised by the Environment Agency.

- 11.2 In line with PPG guidance, the Policy wording has been extended to encompass working conditions, as well as living conditions and additional wording has been added to clarify that a high standard of amenity 'should be achieved and maintained without preventing or unreasonably restricting the continued operation of established authorised uses and activities on adjacent sites.'

- 11.3 It is concluded that no major alterations are proposed, but that the minor amendments, as discussed above, are incorporated in the next iteration of Policy ENV 10, as set out in **Appendix 2**.

12 Conclusions for ENV 11: Protecting and Enhancing the Historic Environment

- 12.1 In response to the consultation comments set out in Section 3, there was general support for the aims of the Policy. As a result of the feedback, a number of additional references have been made with a new subheadings specifically covering Archaeology and Heritage at Risk, and the creation of separate subheadings for designated and non-designated heritage assets.
- 12.2 Changes have been made to the policy that address Historic England comments at Regulation 18 and also to address additional concerns through the formation of the Council's Historic Environment Topic Paper. The topic paper, including the amendments to the policy wording, will form a Statement of Common Ground with Historic England.
- 12.3 It is concluded that no major alterations are proposed, but that the minor amendments, as discussed above, are incorporated in the next iteration of Policy ENV 11, as set out in **Appendix 2**.

13 Recommendations

- 13.1 **It is recommended that Members endorse the revised Policies below, recommending to Cabinet and delegating responsibility for drafting such an approach, including that of finalising the associated policies to the Planning Manager:**

ENV 1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads;
ENV 2: Protection & Enhancement of Landscape & Settlement Character;
ENV4: Biodiversity & Geology;
ENV 5: Green Infrastructure & Public Rights of Way;
ENV 6: Trees, Hedgerows & Development;
ENV 9: High Quality Design;
ENV 10: Protection of Amenity;
ENV 11: Protecting and Enhancing the Historic Environment;

14. Legal Implications and Risks

- 14.1 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.
- 14.2 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.

15. Financial Implications and Risks

- 15.1 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

Appendix 2 – Revised Draft Policy Approaches

Appendix 1 - Schedule of Representations

Extract of Report of Representations

References to 'OFFICER SUMMARY' indicate that lengthier submissions were made and have either been summarised or separated out into relevant policy or site areas. The original representation can be viewed in full by searching the LP ref number at: <http://consult.north-norfolk.gov.uk/portal>

Policy ENV1 - Norfolk Coast AONB & Broads

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP258	Object	<p>Policy ENV 1 states that: 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced.' The policy goes on to note that: 'Proposals for 'major development' in the Norfolk Coast Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as asset out in national policy.' Major development is defined in the Glossary of the NPPF as 10 or more dwellings. However, footnote 77 of the NPPF notes that this is 'other than for the specific purposes of paragraphs 172 and 173 in the Framework', i.e. this definition of major development does not apply in the AONB; as set out in Footnote 41 of the Plan, what constitutes major development in the AONB is a matter for the decision maker, taking into account a number of criteria. Roughton lies at the southern extent of the Norfolk Coast AONB. Our client's site, Land north of Chapel Road, Roughton, lies within the AONB. We suggest that development of 13 units on this site would not constitute major development in this context. Such a development would comply with the description of small scale development set out in Policy ENV 1; it is small scale, it would meet an identified local need for housing, and it is considered that the site does not make a contribution to the natural beauty and character of the area as it has existing development to the north and south, and is relatively contained and separated from the AONB by the sloping topography. My client's other site, land to the east of Norwich Road, lies some 120m outside the AONB. However, the indicative masterplan which has been submitted in support of the representations (Appendix B) has taken account of the presence of the AONB to the North, and has sought to minimise the visual impact of the development by creating a natural woodland buffer along the northern boundary, and by setting back the properties from the A140, with generous planting and natural drainage features.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV1	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV1	Mr Phillip Duncan (1217309)	LP387	Object	Proposed Policy ENV1 The approach suggested is "in the Norfolk Coast Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as set out in national policy(42)" where Footnote 42 reads..... "42 This does not apply to development sites allocated by the Local Plan because the need for those developments and scope for them to be accommodated elsewhere outside the Area of Outstanding Natural Beauty was assessed during Plan preparation." We do not consider the assessments conducted are sufficient to justify the approach proposed in Footnote 42. Our detailed comment on the Site Selection Methodology Background Paper 6 is set out in the attached analysis and feedback.
ENV1	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP659	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV 1 states that: 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced.' This positive attitude to development in the AONB is welcomed. The site lies within the AONB, for five homes will be designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape. The scale and character of the properties will reflect their setting, and the associate landscaping will ensure that they integrate into the environment.
ENV1	Ringer, Mr Callum (1218561)	LP772	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Object to any proposal to increase the AONB due to the impact this will have on house prices and the ability to build affordable homes.

Individuals	Number Received	Summary of Responses (Policy ENV1)
Summary of Objections	3	One objected to the policy in that suitable development necessary to meet identified local housing need that does make a contribution to the natural beauty and character of the area should be allowed in the AONB. Remaining objections focused on the principle of development in the AONB , due to the impact on affordability of house prices and disagreed with the premise of allocation in the AONB throughout the plan
Summary of Support	2	Two support this policy, for the protection of the AONB. One comments that suitable development which is designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape should be allowed. Suggest that other important areas of wildlife habitat and biodiversity should be given similar protection.

Summary of General Comments	0	None received.
Overall Summary		Support received for the protection of the AONB, some suggest that suitable development necessary to meet identified local housing should be permitted under this policy. And suggest that other important areas of wildlife habitat and biodiversity should be given similar protection. One objection disputes the approach to allocations in the AONB, that assessments are not sufficient to justify these developments (Footnote 42).
Council's Response		Comments noted: National policy dictates that whether a proposal is major development in the AONB is a matter for the decision maker, taking into account its nature, scale and setting. The local Plan sets out the strategic policies - individual planning applications will be assessed on its own merits against the whole development Plan.

Parish and Town Councils

No Comments received

Organisations and Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 87	ENV1 Broads Authority (321326)	LP806	General Comments	As this is a planning document, suggest you say that the 'Broads has a status equivalent to a National Park' or that the 'Broads is a member of the National Park family' rather than 'Broads National Park'. • ENV1 – our special qualities are listed in 7.4 of our Local Plan if that helps. DM1 is our Major Development policy. Might be helpful to refer to these? https://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/1571299/FINAL-Local-Plan-for-the-Broads-May-2019-Appendix-1-ba170519.pdf . Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities 'will be carefully assessed'. But there is no instruction to developers to 'demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance....' as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other	Noted: Consider feedback in the development of this policy
	ENV1 Natural England (1215824)	LP718	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Approach supported. Development proposals brought forward through the Plan should avoid significant impacts on protected landscapes, including those outside the Plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF).	Support welcomed
	ENV1 Norfolk County Council (931093)	LP739	Support	We support the policy and supporting text (8.16) to protect and enhance Landscape and Settlement Character, particularly in relation to the area defined as the setting of Sheringham Park which is particularly susceptible to pressures	Support noted

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV1	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP500, 501,502, 504	Support	<p>8.5 – More of an observation but our Integrated Landscape Character Assessment which was undertaken with our partner Local Authorities meant that our character types all dovetailed and enabled a more coordinated response to planning applications. With the changes to the new LCA it has meant that a couple of the character types are now different to our character types. A decision needs to be made as to whether we commission a new LCA and work to integrate these new changes, or whether we don't have our own LCA for the AONB and refer to the Local Authorities LCA'S. This is a conversation that can be had with the Landscape Officers to decide a way forward. 8.6- Could the newly formed county GI and Monitoring group be mentioned? 8.11 We welcome the mention of NPPF para 172. - Policy ENV1 – 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced'. Would like to see the words 'where possible' deleted, as this is too vague for developers. Biodiversity net gains means developers SHOULD be enhancing. Also in the last paragraph of this policy please add that appropriate studies including HRA/LVIA are undertaken. Another example of an AONB policy that has been tested is as follows and could be adapted or partly adapted: Permission for major developments in the Norfolk Coast Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it: a. conserves and enhances the Norfolk Coast AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment; c. meets the aims of the statutory Norfolk Coast AONB Management Plan and design advice, making practical and financial contributions towards management plan delivery as appropriate; d. in keeping with the Landscape Character Assessment by being of high quality design which respects the natural beauty of the Norfolk Coast, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p>	Comments noted : consider comments in the finalisation of the LCA SPD, consider comments in the finalisation of policy ENV1
ENV1	Environment Agency (1217223)	LP459,460,461	General Comments	<p>One missing aspect which should be included is the consideration of designated bathing waters (bathing water directive) and Shellfish water sites in relation to the importance of maintaining good water quality to preserve the standards of these sites. North Norfolk has several designated bathing waters where the bacterial content of any waters discharging nearby can affect the status. Any development in the area draining close to a bathing water should be required to ensure that their discharges do not increase the bacterial content of the waters discharging to the sea where at all possible, in order to safeguard the quality of the bathing water Bathing waters are</p>	Noted: Consider comments in the development the policy and future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 89				<p>important for local tourism to this district. Paragraph 8.2 This section could be enhanced to include policies relating to other priority habitats including: • Chalk streams • Traditional Orchards • Ponds In addition, 'green infrastructure retention' and enhancement' could also be widened to include the creation of new green infrastructure, beyond what is already there. It is noted that reference to new and enhanced green infrastructure is made in paragraph 8.9. We have included further comments here. Paragraph 8.4 We are pleased to see that the plan is acknowledging the need for a Habitats Regulation Assessment. The Environment Agency would welcome the opportunity to comment on the HRA once complete. • Paragraph 8.9 We are pleased to see that following on from our response to paragraph 8.2, this section does include 'new' as well as enhanced green infrastructure. It would be beneficial if this point was made consistently throughout the document. Creating new habitat is essential in reaching the target of biodiversity 'net gain', and linking existing habitats through the creation of new woodland or wildflower corridor, filed margins or even recreational greenspace. Paragraph 8.10 This paragraph acknowledges that development in North Norfolk can affect the Broads in a variety of ways. We agree that development and subsequent population growth may increase visitor pressures on the Broads National Park (as well as other designated sites). The paragraph should also include impacts associated with abstraction. Any smaller scale developments without connection to mains water that will rely on de-minimus abstraction of 20 cubic metres per day of unlicensed water use should have requirements to minimise water usage for example rainwater harvesting or the re-use of grey water. The plan should identify if there are areas where the de-minimus level of abstraction would cause unacceptable harm and allow scope to restrict development or activity where this is the case. This should also apply to other sensitive waterbodies that might fall outside the Broads designation. • Policy ENV 1 – We welcome the inclusion of this policy, specifically where it refers to opportunities to enhance.</p>	

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

Responses on Alternatives

No comments received on the alternative approach presented

Policy ENV2 - Protection & Enhancement of Landscape Character

Individuals

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

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

Parish and Town Councils

No comments received

Organisations and Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV2	Broads Authority (321326)	LP806	General Comments	What are the settlement character studies referred to in this report? Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities 'will be carefully assessed'. But there is no instruction to developers to 'demonstrate that their location, scale, design and materials will protect, conserve and, where	Concerns Noted: Consider feedback in the development of this policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				possible, enhance....' as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other	
ENV2	Natural England (1215824)	LP719	General Comments	We welcome the commitment to enhance connectivity to surrounding green infrastructure and Public Rights of Way networks. We suggest that enhancement also facilitates wildlife through management of footpath edges/verges to increase biodiversity where possible.	Noted: Consider comments in the development of the policy
ENV2	Gladman Developments, Mr Craig Barnes (1217131)	LP281	Object	Gladman acknowledge the need to ensure that the environment is sufficiently protected through new developments with net gains provided where possible. Gladman broadly support Policy ENV2 and the list of criteria to be considered in the design of new development and consider it helpful to avoid later delay and potential refusal of development. Gladman is however concerned that the current wording of the policy referring to gaps between settlements (as set out in Point 2 of the Policy) may be confused to mean any gap between settlements, no matter how significant a distance it is, as a reason to resist development proposals. The interpretation of the policy in this way may place significant constraints on new development leading to a blanket and unjustified protectionist policy. Proposed changes: To address this, Gladman consider that Point 2 of the Policy should be reworded to make clear that only the most sensitive of gaps will be considered under this policy, where settlements are visible from one another and/or the gap between settlements perceptibly small/weak. The scale and type of development proposed should also be a key factor by the Council in determining the suitability of a development against this policy.	Noted: Consider feedback and clarification in relation to bullet 2 in the development of this policy
ENV2	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP505	Support	Policy ENV 2 -Again strike out 'where possible' enhance as too vague. There is an onus on developers to enhance now so this needs to be clear. We welcome the mention of nocturnal character and also support the expectation to demonstrate mitigation and enhance connectivity to GI	Comments noted : Consider comments in the finalisation of the policy
ENV2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Amend Criterion 7 from Historic Parks and Gardens to Registered Parks and Gardens.	Noted- consider amending the wording in the preparation of the policy
ENV2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Presume Setting of Sheringham Park is based on the Zone of Visual Influence identified by the National Trust in 2005/6. The setting of heritage assets can change over time and also the setting is more than just visual links but encompasses other factors such as noise, odour, light and how an asset is experienced. We would therefore be cautious	Noted - consider discussions with Historic England regarding Sheringham Park through the

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

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

Alternatives

No comments received

Policy ENV4 - Biodiversity & Geology

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Yardley, Mr Christopher (1218066)	LP688	Support	<p>~I would also like to emphasize that the starting point for development should not be how to bolt on supposed 'net gain' in a specific development but to look to understand the impacts of the development on the existing site and wider biodiversity of the area</p> <p>~I would also like to suggest that the policy be amended to include an additional key fourth point after 'all development proposals should' to the effect that the Council will engage with NGOs contributions towards the enhancement of biodiversity. Support additions to the proposed wording of the policy to enhance the value and meaning of the policy in line with NPPF guidance and wider community involvement.</p>
ENV4	Spowage, Mr Richard (1216878)	LP326	General Comments	<p>There is a need to emphasise councils duty to protect and enhance all wildlife and ensure suitable ecological information is supplied with any proposal to ensure correct mitigation is achieved both pre development, to prevent loss of species from sites, to post development ensuring long term protection and management of proposed mitigation. In addition the is need to ensure wildlife habitat mitigation is the primary aim and not part of a strategy of public open space which could be detrimental to target species. In addition mitigation needs to have regard for habitat connectivity seeking to link habitats and avoid fragmentation.</p>
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided</p>
ENV4	Bell, Ms Jane (1218416)	LP799	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly support the aims in paragraphs 8.22 & 8.23 and consider that those in paragraph 8.22 are of the highest importance. I am delighted to note that the 'provision of 'wildlife homes' is now an official stipulation with regard to ' development proposals'. However, I question the last paragraph (p. 96). If a 'designated site (etc.) may be adversely affected by a development proposal', why should the council consider a development application in the first place, if it is going to cause inevitable, irreversible ecological damage? That is what 'adversely affected' means. pp . 129; 135 – 137 Par. 9.49, 9.50</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Duncan, Mr Phillip (1217309)	LP396	Object	Proposed Policy ENV4 This proposes that developer contributions will be required based on “the emerging Recreational Impact Avoidance and Mitigation Strategy 57” . Footnote 57 confirms that “A Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (RAMS) is currently being commissioned collectively by the Norfolk Authorities and Natural England”. We do not consider it reasonable to propose a policy based on a study which has only just been commissioned, and for which there are no proposals for public consultation set out.
ENV4	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All developments should be subject to an environmental impact assessment to ensure they minimise their carbon footprint and an equality impact assessment to ensure they benefit all residents
ENV4	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Suggest a bold new environmental initiative by NNDC to aim to make North Norfolk a red squirrel only District by the end of this planning period. It would mean building on the start made by the Holkham estate and persuading land owners and residents on the land to the south to eliminate gradually the grey squirrel. This would for a start save the National Trusts woods at Felbrigg from the appalling damage inflicted on them by lack of control of grey squirrels, and is in tune with the HMG initiative to plant more trees. Other D.C’s and counties would follow this initiative but NNDC could take most of the credit.
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county’s biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV4	Dixon, Cllr Nigel (1218612)	ILP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Ensure layout and land usage creates maximum habitat and area connectivity for wildlife and promotes the recreation of ecosystems essential to address part of the climate change agenda. The Plan should incorporate a requirement to involve a recognised wildlife conservation or preservation authority to both advise on the layout of major sites and become a delivery and maintenance partner.

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

Parish & Town Councils

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

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

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Broads Authority (321326)	LP806	General Comments	8.23 – is the Landscape Character Assessment date correct? Should it be 2019? Could refer to Broads Landscape Character Assessment, Broads Landscape Sensitivity Study and Broads Biodiversity Action Plan too. • ENV4: is 'should' a strong term? Could it say something like 'are required to' or 'shall'? ENV5 for example says 'will'.	The LCA is dated 2018. Consider additional comments in the finalisation of the Plan
ENV4	Environment Agency (1217223)	LP463,464	General Comments	We welcome the inclusion of policy ENV 4. This should be further enhanced to extend the policy to include non-statutory designated sites (CWS and UK BAP habitats). Any development proposal that is put forward for a CWS or UK BAP site could be scoped out at an early stage. If future development is restricted to agricultural land, maintaining existing green infrastructure (for example, hedgerows), there is a far greater potential that the development could bring overall net gain for biodiversity. • Paragraph 8.20. We would also like to see protection extended to non-statutory designated sites such as County Wildlife Sites (CWS) and UK BAP priority habitats (including chalk streams). Paragraph 8.21 and 8.22 We are pleased to see the reference to Biodiversity net gains in these paragraphs. The paragraph would be further enhanced by being extended to include scope for habitat creation to occur beyond the boundary of the development site. This has the potential to allow for a greater expansion and connectivity of existing habitats expected through the creation of new green	Noted: Consider comments in the development the policy and future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 97				<p>corridors and habitats for new legislative measures. In addition, it would also be beneficial to include the provision of a buffer of 8 to 20 meters of undeveloped land (e.g. grassland or woodland) between the boundary of new development and the water environment. This would further help maintain the connectivity for species along the riparian corridor, and help protect the watercourse from being over-managed. This section should also seek opportunities for and promote tree planting alongside rivers. Trees are important in helping to keep rivers cool and therefore improving the state of the river for biodiversity. By providing shade, trees are able to moderate the extremes in water temperature which can be detrimental to fish spawning. Their underwater root systems provide valuable habitat to fish and invertebrates whilst stabilising the banks. Shading can also be helpful in the control of aquatic vegetation and well as bringing benefits for people. In addition, shading can help combat blue-green algae. Paragraph 8.23 We fully support the use of Ecological network mapping and linking existing priority habitats as identified in the Norfolk BAP. We support the prioritising of enhancement and expansion of existing resources as well as re-connecting habitats where they have been destroyed.</p>	
	ENV4	Natural England (1215824)	LP720	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Protection afforded to designated sites and the commitment to a strategic approach to mitigate recreational visitor impacts to European site is welcomed. Developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify impacts and mitigation, resulting in the delivery of a costed suite of measures. We understand that a report to facilitate a Norfolk Wide Green Infrastructure and Recreation Management Strategy is currently being researched and drafted. The strategy should be assessed to determine the suitability in mitigating the effects of increased recreational disturbance to North Norfolk’s designated sites as a result of strategic growth. The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF. We support the recommendation to split Policy ENV 4 to cover designated and non-</p>

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>we can record/request quantitative data on the loss and gains. Biodiversity net gain comes from 'enhancement' i.e. 'restoring habitats not affected by construction – for example, an area of ancient woodland that is in poor condition'. The other, more common meaning of 'enhancement' is 'providing environmental benefits over and above the measures required for mitigation'. Such enhancements do not constitute mitigation or compensation. Mitigation is carried out to limit and compensate for impacts, prior to any enhancement. (four steps of the mitigation hierarchy – avoid, minimize, restore and offset). Avoiding/protecting hedgerows, ponds etc. is mitigation, not net-gain. Creating an additional pond, woodland is net gain. - Recommendation: we would strongly recommend that text to the effect that 'enhancement and mitigation measures should, where available, be evidence based' is included. There is a wide range of published information available relating to mitigation and conservation strategies that must be incorporated into strategies to maximise chances of success. Para 8.23 Recommendations: Please remove references to the Norfolk Biodiversity Action Plans (BAPs). BAPs ceased to exist in 2012 with the publication of Biodiversity 2020: A strategy for England's wildlife and ecosystem service. You might want to add a footer along the lines of 'Priority habitats and species refer to those identified as being of principal importance in England, in Section 1 of the Natural Environment and Rural Communities Act 2006'. Comment: Soprano pipistrelle bats were identified as a UKBAP, but they are very common throughout Norfolk, so might not be a species requiring targeted conservation action. Other bat species would be a higher priority.- para 8.25 Replace ..."and replacement habitats may need to be provided to ensure no net loss of important habitats with '... and replacement habitats may need to be provided to ensure no net loss of important habitats.' - specific to the policy wording On the 13th March, in the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the word 'should'. Recommendation: After '...ecological function' add 'and ecosystem services'. Bullet 2 add 'habitat and ecosystem functions'. Bullet 3 On the 13th March, in</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
Page 100				<p>the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the words 'where appropriate. Plus replace wildlife homes with Nests and roosts. Remove also where ever possible from third para. footnote 56 Remove reference to Norfolk Biodiversity Action Plans as per previous comment. Could reference Section 1 of the Natural Environment and Rural Communities Act 2006. - second part of the policy should be updated in line with: Proposals whose principal objective to conserve /enhance biodiversity or geodiversity interests should not be given planning if it will result in significant detriment to nature conservation interests. I would suggest re-ordering the sentences: Development proposals where the principal objective is to conserve (add in) and/or enhance biodiversity or geodiversity interests will be supported in principle, unless Development proposals that would result in significant detriment to the nature conservation interests of nationally designated (and internationally designated?) sites will not be permitted. However, if proposals that would otherwise be granted as their principal objective is to conserve and/or enhance biodiversity will have a significant detriment to the nature conservation interests of nationally designated sites, they will not be permitted. Last para re proposal for an Ecological environmental impact assessment ...and PEA...A PEA refers to the survey of the site. The result of the survey(s) are presented in a PEAR (Preliminary Ecological Appraisal Report) or EclA (Ecological Impact Assessment). A PEA cannot be submitted as it is not a report, just the survey. Recommendation: add in '...to assess effects on all sites of nature conservation value..' PEAs should be undertaken at all sites of conservation value, not just for European Sites.</p>	
	ENV4	Gladman Developments, Mr Craig Barnes (1217131)	LP282	General Comments	Gladman largely support the requirements of Policy ENV4 which seeks to protect, support and enhance biodiversity. Gladman consider that the overall thrust of the Policy is consistent with the aims of the NPPF for sustainable development which seeks to secure net gains for the environment. The policy is sufficiently flexible providing opportunity for mitigation where direct or indirect

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>adverse effects on designated sites are unavoidable. Proposed changes: To ensure that requested contributions required by the policy to address visitor impact on European Sites is consistent with national policy on planning obligations, Gladman consider that the policy should be reworded to make clear that the contribution required should be linked to the proposed development and the increased usage of these sites which is associated with the development.</p>	<p>avoidance and mitigation Strategy and in line with advice from natural England will be used to inform future iterations of the Plan and address impacts on European Sites</p>
ENV4	CPRE (Mr Michael Rayner) (1204056)	LP299	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Therefore, greater recognition needs to be given to the role of rivers and the land around them in policy ENV 4. In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Our concerns arise from a generalised text which makes no mention of rivers at all, far less the importance of those in North Norfolk; and the overlay throughout of setting biodiversity activities solely through the prism of development and net environmental gain. See paragraph 8.21 in the draft as setting the scene: In 2018 the Government indicated that they intend to require developers how they are improving the biodiversity of a site, to deliver a biodiversity net gain. This is part of an ambition to embed the wider principle of environmental net gain in development. While this can be provide some opportunities it cannot, and need not, stand alone, as implied by the draft support text and policy. The developer will start with the development they want, and then see what can be bolted on in terms of biodiversity and net gain; and in the same way land for a new school or some other community benefit. This is different approach from starting from biodiversity as the core aim in the context of a wider long term strategy and its implementation. Much of has comes from NGO s. This is missing now in the draft, but was and is present in</p>	<p>Noted Consider comments in the finalisation of the policy</p>

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>CIEEM), in order to demonstrate that BNG and allow for monitoring of progress towards the Vision, Aims & Objectives of the plan. We support the inclusion of requirements for wildlife homes in new development, such as swift and bat boxes, which will help integrate wildlife into new development, providing people with more opportunities to encounter wildlife on a daily basis, improving their quality of life, as well as making new development more permeable and less of a barrier to wildlife movement. We support the commitment to developer contributions regarding visitor impacts from new development on European sites and support the recommendations in the accompanying HRA regarding the incorporation of the developing county-wide Recreational Impact Avoidance & Mitigation Strategy into the next draft of the local plan. We also support the recommendation made in the HRA for the separation of this element out into a separate policy, for clarity. Proposed Changes: In order to ensure the plan vision of conserving and enhancing Norfolk's distinctive and bio diverse environments is achieved, we strongly recommend that the wording here is changed from should to will, so that the end of the paragraph reads i.e. 'development proposals will deliver net gains in biodiversity'. We recommend that in the second paragraph, the text is changed from 'biodiversity net gains and contribution to ecological networks should be sought' is changed to 'measurable biodiversity net gains and contribution to ecological networks will be sought' in order to provide consistent application of the policy and avoid any ambiguity. We also recommend that the treatment of visitor pressure impacts on European Sites is placed into a separate policy for clarity, as recommended in the HRA.</p>	<p>area in relation to European Sites</p>
ENV4	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports the need for protecting biodiversity and creating net-gain in new development through restoration and enhancement measures. As with Policy ENV2, Policy ENV4 should be clear in protecting biodiversity and should pursue opportunities for biodiversity net-gain as per NPPF paragraph 174. It should have sufficient flexibility so as not to limit development where constraints can be managed and addressed through an appropriate design solution. This will ensure the policy is effective and consistent with NPPF paragraphs 174-177.</p>	<p>Support noted. Consider comments in the development of the policy.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP316	Object	<p>Policy ENV4 states that: “Developer contributions will be required to ensure that visitor impact mitigation on European sites from additional pressure on Natura 2000 sites is in line with the emerging Recreational Impact Avoidance & Mitigation Strategy for recreational impacts on those sensitive sites.” We ask to what extent will that Strategy be subjected to appropriate public scrutiny and examination, including the justification/viability in asking for financial contributions from applicants? We raise this point as hitherto - via a somewhat nebulous provision in Site Allocations polices of the current Plan - developers have been asked for £50 per dwelling towards mitigation, without any apparent critical/assessment basis for the principle or value of the contribution sought. Seek clarification on developer contribution/mitigation measures</p>	<p>The council is working jointly across Norfolk authorities and with Natural England to develop an evidence base to inform local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with Habitats Regulations and a strategic solution to deliver mitigation necessary to avoid the likely significant effects from in-combination impacts of residential development that is forecast across Norfolk. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan</p>

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

Alternatives

ENV4	Mr & Mrs Johnson (1215700)	AC028	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ENV4. - Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided	Comments noted: This comment repeats the support ENV4 made against the First Draft Local Plan (Part 1).
------	----------------------------	-------	---------	--	---

Late Representation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments	Council's Response
ENV4	Norfolk Geodiversity Partnership	N/A	General comments	OFFICER SUMMARY: The Norfolk Geodiversity Partnership (NGP) is working to conserve geodiversity outside the SSSI network and is responsible for	Comments noted: consider comments in

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments	Council's Response
				<p>designation of Local Sites of geodiversity interest in Norfolk. These include County Geodiversity Sites (CGS) and candidate CGS.</p> <p>NGP request inclusion of wording within the policy justification at 8.20 regarding Local Sites, in relation to biodiversity and geology including 'international, nationally and locally designated sites' and at 8.3 adding '2 County Geodiversity Sites (CGS) and 42 candidate CGS.' Also request amendment to para 8.24 to include that the '<i>NBIS also distributes data about Local Sites of geodiversity importance and further information about them is available from the Norfolk Geodiversity Partnership.</i>' Commenting that as mentioned in footnote 55 the term</p> <p>'Regionally Important Geological Sites' is no longer in wide usage and is best replaced by 'Local Sites' which comprise both biodiversity and geodiversity sites. CGS and CWS are the Norfolk versions of this Local Sites category.</p>	the development of the policy.

Policy ENV5 - Green Infrastructure

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	Woodward, Mrs Josephine (1217427)	LP605	General Comments	Provision is to be made for the enhancement of green infrastructure and a clear definition of the provision of green infrastructure.
ENV5	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NNDC must work to lower the carbon costs of transport. It should support developing safe for pedestrians and cyclists, and cleaner buses, and delivery vehicles of all sorts. It could provide a fleet of cleaner cars for its own staff to use on council business. It could lobby for lower road speeds.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. See comments. Green infrastructure should be considered in terms of its overall contribution as wildlife corridors and prevent isolation of green areas in order to encourage biodiversity.
ENV5	Watson, Mr Martin (1215724)	LP118	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Many holiday-makers as well as local citizens want to enjoy the beauty of the North Norfolk countryside, keeping healthy by walking and cycling. The problem is that many of the roads that lead through the countryside are narrow and pose dangers to cyclists. There may be safe riding opportunities in campsites and caravan parks but on the open road there are many places where families cycling with children run real risks from motorised traffic. Not having safe cycling paths or tracks discourages holiday-makers with families from coming here as well as the local population from keeping fit on their bicycles. Re aims to: 'facilitate increased cycling': discrete cycle paths and tracks are needed. I would suggest that particular areas of danger are identified and efforts made to eradicate the danger. An example is: the road from Weybourne to Holt. The whole road is narrow but the main danger is at the top of the hill. There the road bends to the left as it flattens out but the sides are steep banks and do not allow a cyclist to leave the road if a large vehicle is approaching at the same time. Children especially are at risk. There are many such examples in our area which could be made safe if cycle paths were available off the roads. Cycle tracks are required. Areas of danger for cyclists should be identified and efforts made to eradicate the danger.
ENV5	Mr Phillip Duncan (1217309)	LP401 LP402 LP405	Object	Proposed Policy ENV5 and the Green Infrastructure Background Paper 5 The Draft Plan makes clear (paras 8.27 and 8.29) that the policy is informed by the Green Infrastructure Background Paper 5. However the Paper simply states that “Land allocations in Cromer seek to provide 600 homes and are outlined below” The principles offered in the GI paper are only in relation to those selected sites - The starting point for consideration of GI appears only to begin on the assumption that the sites considered are the best, not that a GI assessment is offered to inform site selection as set out in the Draft LP. This is therefore inconsistent. The approach in the GI paper appears inconsistent with the role of a Local Plan – it is suggested in regard to Cromer that “some of the formal sports pitches in the town could be considered at the threat of development as they are potentially attractive development plots within the settlement boundary” (p.13). One of the roles of the Local Plan is enabling retention of such valuable facilities – as is demonstrated in Policies SD6 and ENV7. The GI paper as an informing document appears inconsistent.
ENV5	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Cycle paths, electric public transport, green spaces for outdoor leisure need to be a part of every built area. This must be as great a priority as built space. Present constructions provide little in the way of wild space.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	North Norfolk District Council Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Vital to the health and wellbeing of the people of the District. We welcome the GI Position Statement and the GI plan for North Walsham which is contained within it, stipulates a requirement for walking and cycling paths, green corridors for wildlife and extended provision for woodland. Makes no direct reference either to Pigney’s Wood or to the reclamation of the Dilham Canal. These are vital resources for the health and wellbeing of our town and they deserve to be incorporated within a strong GI plan linking any town extension to the town centre and countryside. We welcome mention of connectivity as without this the policy will not be helpful either to people or wildlife. We would like to see that there is rigorous testing of any assertion that green infrastructure cannot be delivered on a proposed site. If after such testing this can be demonstrated, then enhancement and mitigation must be delivered as close to the development site as possible.

Page 8	Individuals	Number Received	Summary of Responses (Policy ENV5)
	Summary of Objections	5	Five objections: suggest that NNDC should lower the carbon costs of transport, provide safe pedestrian and cycle routes, encourage electric public transport and ensure that green spaces are provided for outdoor leisure as part of every built area. One objection raises concern over inconsistencies with this policy and the GI Background Paper.
	Summary of Supports	2	Two support this policy and were in agreement that GI should be considered in terms of its overall contribution as wildlife corridors and prevent isolated green areas in order to encourage biodiversity. Cycle paths are needed to allow and encourage holiday makers and residents to enjoy the countryside walking or cycling. Roads are considered narrow and dangerous for cyclists.
	Summary of General Comments	2	Two general comments received. GI is vital to health and wellbeing of the people in the District. Welcomes GI plan for North Walsham but makes no direct reference to Pigney's wood or Dilham Canal. Welcome more rigorous testing of whether GI can be provided, otherwise should be delivered close to the development. Suggests that a clear definition of the provision of green infrastructure is required.
	Overall Summary		No substantial issues raised. Most comments highlighted the importance of GI for the health and wellbeing for residents. A number suggest that NNDC should lower the carbon costs of transport encouraging electric public transport and improve walking and cycle routes. Others suggest that green spaces should be provided as part of every built area and to prevent isolation of green areas in order to encourage biodiversity and to contribute as wildlife corridors. One seeks clarification of what green infrastructure is required.

Council's Response	Noted: agree, The plan positively promotes the provision of high quality on site GI and enhancement and improvement of the existing strategic network. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to inform future site specific requirements.
---------------------------	--

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV5	Cromer Town Council (1218420)	LP732	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More houses means more traffic movement to and from the houses including for example the collection and disposal of waste. Cromer is already a congestion hot spot. • Consideration is required in respect of public transport for people who cannot afford to live in Cromer and have to commute to the town. • Cycleways should be included as part of allocations. It is noted that improvements to the existing cycle routes are not proposed as part of the infrastructure position statement, and this could be a useful addition. • Details and referenced documents indicate that areas in and around Cromer make a significant contribution towards congestion “hot-spots”, though no ongoing actions are proposed to mitigate this in view of further major development. We feel an individual traffic and transport study is a requirement in Cromer to help identify means of mitigating against current congestion and other transport pressures. Footpaths</p> <ul style="list-style-type: none"> • Northrepps FP16 – There is concern at the impact on biodiversity if this footpath is extended to Roughton Road 	Noted: NCC highways have informed the identification of site options. The impact of traffic generation and cumulative effects have been taken into consideration in setting the distribution and housing numbers. Support for on-site and off-site improvements and improved connectivity for green infrastructure is welcomed. Further requirements are detailed in the Green Infrastructure position statement and policy ENV5.
ENV5	Sheringham Town Council (1217426)	LP548	Support	STC agrees with the proposed policy but would like to see the policy strengthened, particularly with regard to linking green areas and open spaces.	Supported welcomed. Consider comments in the development the policy.

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

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV5	Natural England (1215824)	LP721	General Comments	GI is central to the planning process and policy points should include requirement for monitoring and evaluation of new GI especially in the case of habitat creation. We welcome the safeguarding and provision of Green Infrastructure delivered through Policy ENV 5. We agree that all development should include GI principals and deliver proportionate requirements. We recommend the Green Infrastructure Partnership as a useful source of information when creating and enhancing GI.	Noted
ENV5	Norfolk County Council (931093)	LP739	General Comments	Could additionally make reference to the Public Rights of Way network as a location for offsite enhancement where required	Noted:- Consider comments in the finalisation of the policy
ENV5	Gladman Developments, Mr Craig Barnes (1217131)	LP283	Support	The role of Green Infrastructure in supporting health and wellbeing of residents, together with the benefits for wildlife is recognised by Gladman. As such, Gladman always promotes sites which provides substantial amounts of high-quality green infrastructure, and which can connect to and complement existing green infrastructure. Gladman therefore broadly support the aims of this policy. Given its role within the policy, the Council will need to ensure that the Green Infrastructure Background Paper is made available and continues to be made available following adoption of the Local Plan. The Council should	Noted: support welcomed - Disagree (partly) - Consider comments in the development the policy and the finalisation of the approach to GI. Background paper no 5

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				ensure that this evidence is kept up-to-date through future reviews of the Local Plan. Care should be taken by the Council in setting the language for the policy. The policy requires a detailed scheme setting out the Green Infrastructure provision for a development, however this wording does not account for the fact that some developments will be promoted as outline applications initially, where matters of scale, layout and landscape will often be offset to be determined at the reserved matters stage. Proposed changes: The policy should be reworded to account for this, requiring only sufficient information at the outline application stage to allow for decision makers to determine that the proposed development is capable or responding to Policy ENV5 at the detailed application stage.	Green Infrastructure was published as supporting information at the time of the consultation
ENV5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP508	Support	Policy ENV 5 – We support but there needs to be monitoring in place to ensure this is carried out	Consider comments in the finalisation of the policy and monitoring Framework
ENV5	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Encourages the provision of green infrastructure and recognises it can enhance individual developments as well as having a cumulative positive impact across the District. The policy should be formulated in such a way to ensure that green infrastructure provision on individual sites should however be proportionate and appropriate to the scale of development and should not overburden developer at the expense of other aspects of sustainable development. This will ensure individual developments remain viable and that the policy is effective and consistent national policy (NPPF paragraph 34).	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV5)
Objection	0	
Support	3	

General Comments	2	The approach of providing GI and its role in wider benefits both health and environmental was recognised and the policy aims supported. A monitoring strategy should be developed and further requirements around GI improvements set out in a background paper.
-------------------------	---	--

Alternatives

ENV5	Mr & Mrs Johnson (1215700)	AC029	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV5. - Green infrastructure should be considered in terms of its overall contribution as wildlife corridors and prevent isolation of green areas in order to encourage biodiversity.	Comments noted: This comment repeats the support ENV5 made against the First Draft Local Plan (Part 1).
------	----------------------------	-------	---------	---	---

Policy ENV6 - Trees & Hedgerows

Individuals

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

Individuals	Number Received	Summary of Responses (Policy ENV6)
Summary of Objections	0	None received

Summary of Supports	1	One supports this policy, to encourage the retention of biodiversity, to provide a network of wildlife habitat across the county and not just isolated areas
Summary of General Comments	1	One general comment received. Tree planting should be encouraged.
Overall Summary		Limited comments received and no substantive issues identified. The policy was supported and considered necessary to prevent the erosion of biodiversity and to provide network of habitat across the county. Tree planting should be encouraged.
Council's Response		Noted.

Parish & Town Councils

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

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

Statutory Bodies & Other Organisations

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV6	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP509, LP510	Support	Support	Support welcomed

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

11
Alternatives

ENV6	Mr & Mrs Johnson (1215700)	AC030	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV6. - This is absolutely necessary to prevent the erosion of biodiversity, and to provide a network of wildlife habitat across the county and not just isolated areas. See comments on ENV1. As many trees, hedgerows, coppices, ponds and mature areas of woodland as possible should be retained. On any developed land trees and hedges should be retained and protected by planning conditions wherever possible.	Comments noted: This comment repeats the support ENV6 made against the First Draft Local Plan (Part 1).
------	----------------------------	-------	---------	---	---

Policy ENV8 - Public Rights of Way

Individuals

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

Page 116

Individuals	Number Received	Summary of Responses (Policy ENV8)
Summary of Objections	1	One objection received. Promoting a site in Roughton, that could provide links from the site to footpath (Roughton FP15) providing a highly permeable development fully accessible by pedestrians to the village and church.
Summary of Supports	1	One supports this policy, but also raises concerns over the potential impact on certain areas of wildlife from disturbance by inappropriate behaviour, noise and dogs. And suggests that consultation with National Trust and other experienced organisations is essential.
Summary of General Comments	0	None received

Overall Summary		Generally supportive of policy, but also raise concerns over the potential impact on certain areas of wildlife habitat from disturbance by inappropriate behaviour, noise and dogs. Consultation with National Trust and other experienced organisations is essential.
Council's Response		Noted: agree, The plan positively promotes the provision of high quality on site GI and enhancement and improvement of the existing strategic network including public rights of way. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and provided enhanced mitigation measures through partnership work.

Parish & Town Councils

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

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

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV8	Natural England (1215824)	LP723	Support	We appreciate the protection and enhancement of Public Rights of Way and the creation of additional footpath networks and accessible green space through Policy ENV 8.	Supported welcomed
ENV8	Norfolk County Council (931093)	LP739	Support	Policy could make reference to the importance and opportunity of accommodating Public Rights of Way within developments. It should also be noted that developments should contribute towards infrastructure improvements where there will be increased footfall on public rights of way adjacent to the development	Noted:- Consider comments in the finalisation of the policy
ENV8	Norfolk Local Access Forum, Mr David Hissey (1217490 & 1217491)	LP639	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Norfolk Local Access Forum agree with the environment policies, including Policy ENV8 - Public Rights of Way (PRoW) and request that the Forum is consulted about any planning application that involves a PRoW.	Noted.
ENV8 ENV9?	Norfolk Police (1217249)	LP734	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Request the heading Safety be replaced with Security • 'In town centres covered by CCTV systems, developers will be required to consider these facilities in their design and/or contribute to the siting/re-siting of cameras where appropriate'. This sentence appears connected to SBD/Norfolk Constabulary, suggest extra line for clarity. 8.73 – PARKING (pg 106) • No reference to security which is integral to its functionality – request wording 'secure or safe' to be incorporated.	Noted- consider inclusion of the additional wording proposed through the preparation of the policy.
ENV8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV8 aims to protect and enhance public rights of way (PROW) and encourage well connected, permeable development. This is through new development creating convenient and attractive links to surrounding areas, connecting to walking, cycling and public transport networks. This is conducive to good, sustainable urban design and placemaking which aligns with the Duchy of Cornwall's development principles. Any	Support noted. Consider comments in the finalisation of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				requirement for a developer to improve a PROW as part of a development scheme should be proportionate, necessary to make the development acceptable, and should not overly burden the developer to ensure it remains deliverable. This will ensure the policy is effective and consistent with national policy. Policy DS7 states that improvements to a PROW are a site-specific requirement. This is questioned given in our comments to Policy DS7 given the site's distance from Rudham Stile Lane.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV8)
Objection	10	The approach was largely endorsed by those that responded. In finalising the policy it was suggested further commentary on the inclusion of public right of way and the opportunities for development to provide proportionate improvements to PROWs.
Support	3	
General Comments	1	

Alternatives

ENV8	Mr & Mrs Johnson (1215700)	AC032	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports Assessment ENV8. - Recent issues surrounding access to the coast as a result of some national policy have caused concern. There are issues regarding access in certain areas of wildlife habitat and disturbance by inappropriate behaviour, noise and dogs. Organisations such as National Trust and NWT try to strike a balance between access for all at certain times of year and restricted access at other times to prevent wildlife disturbance or habitat erosion, especially where endangered species are concerned. Consultation with these and other experienced organisations or bodies is essential in developing a policy.	Comments noted: This comment repeats the support ENV8 made against the First Draft Local Plan (Part 1).
------	----------------------------	-------	---------	---	---

Policy ENV9 – High Quality Design

Individuals

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

Individuals	Number Received	Summary of Responses (Policy ENV9)
Summary of Objections	2	Two objections received. Design of buildings should be of traditional material, skills and design in keeping with the location whether in the AONB or not. Developers seem to have a design identikit. Consideration should be given to car parking on developments in villages; garages are unnecessary but off-the-road space for two vehicles per dwelling must be allowed for. Development should exceed current sustainability targets and design guidance should be enforceable.
Summary of Supports	2	Two support this policy. There is concern expressed about newly built infill dwellings along the coast and about the loss of residential gardens to development.
Summary of General Comments	2	Two general comment received, these measure will put up the cost of houses but is needed. Important for North Walsham - would not like to see any weakening of this draft policy.

Overall Summary		No substantial comments received or issues raised. There is support for a strong design policy. Some consider that design of buildings should be of traditional material, skills and design in keeping with the location whether in the AONB or not and concern that developers seem to have a design identikit. Consideration should be given to car parking on developments in villages; garages are unnecessary but off-the-road space for two vehicles per dwelling must be allowed for. Development should exceed current sustainability targets and design guidance should be enforceable. There is concern expressed about newly built infill dwellings along the coast and about the loss of residential gardens to development.
Council's Response		Comments noted. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk. In conjunction with the emerging Design guide SPD, the purpose of this policy is to provide a set of design principles which when followed will result in improved design and ensure the special character and qualities of North Norfolk are maintained and enhanced.

Parish & Town Councils

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

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

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Environment Agency (1217223)	LP466	General Comments	Policy ENV 6 – Trees and Hedgerows Opportunities for tree planting alongside rivers should be promoted. Riparian tree cover helps shade the river and keep water temperature cool in the summer. This can help reduce the effects of climate change and could become increasingly important as summer temperatures rise. Riverside tree roots also provide important refuge for fish fry and aquatic invertebrates, as well as mammals and bird species.	Noted: Consider comments in the development the policy.

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					vernacular in paragraph 3.65 in the preparation of the plan
ENV9	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Welcome the policy and Design Guide. Welcome criterion 6 relating to the historic environment and criterion 7 referring to distinctive local character	Support noted
ENV9	Designworks (1217232)	LP303	General Comments	The 2019 version of the National Planning Policy Framework places much greater emphasis than previously on the vital issues of good design and constructive engagement with applicants. In view of the thorough and commendable objectives set by the Draft Local Plan, it is therefore disappointing to note little reference to the need to strive for design excellence and a creative interaction between professionals. A collaborative approach in which the architect, client, and planning authority develop an early understanding and common set of goals is the most logical and rewarding path to good buildings and environments. It is almost impossible to achieve the excellence that NNDC is clearly striving for without embracing this approach. To be effective, consultation needs to be at the earliest possible stage, and to be meaningful. Too often in some authorities there is a token process in which pointless non-committal comment is made at arm's length on a design already evolved, the stage at which it can be too late for the planning authority to influence the fundamental design, There are important economies to be had in the constructive approach described. For the planning authority: greater efficiency, with a reduction in potentially time-consuming conflict with applicants, sometimes leading to a costly appeal. For applicants: greater certainty that early engagement will lead to a speedier and more successful outcome.	Noted - The North Norfolk Design Guide provides the detailed guidance to support policy ENV 9. Consider the addition of wording regarding guidance in the policy wording itself.
ENV9	Norfolk Police (1217249)	LP294	General Comments	I would like to make you aware that I am submitting comments on the Local Plan Draft and Interim Sustainability Appraisal via the planning policy email. In particular comments on Detailing and Residential Development).	Comments noted

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Norfolk Police (1217249)	LP734	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <p>Intro States “All development proposals should respond to current best practise and demonstrate that they are in conformity with the design principles set out in established..... Or other design guidance endorsed by the Council”</p> <ul style="list-style-type: none"> • Seek confirmation that North Norfolk Council endorses Secured By Design Guides,(8.67 Safety states SBD principles are expected to be incorporated within all schemes”) Also/ Draft Design Guide: 12) Signposting & Glossary: Placemaking - includes reference to SBD guides and therefore within point 8 of policy ENV 9 there is specific reference to SBD principles Policy Env 9 point 8 states: reduces opportunities for crime, terrorism and antisocial behaviour, creating safe, secure and accessible environments; request addition of ‘reflecting principles of Secured By Design’. 	Noted- consider inclusion of the additional wording proposed through the preparation of the policy.
ENV9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP621	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Seeks to set out the requirements necessary for good ‘place making’. It serves as a ‘catch all’ anchor policy for the related, North Norfolk Design Guide Supplementary Planning Document (SPD) and issue specific policies set out elsewhere in the emerging Local Plan. We support the policy and its aspiration to achieve high quality design, which aligns with Pigeon’s aspirations for site C10/1. However, we would highlight that the reference to development complying with the SPD is not compliant with the Regulations, which do not allow development plan status to be applied to supplementary guidance which have not been the subject of examination. As such, the Council may wish to consider stating within Policy ENV 9 that the SPD is guidance.</p>	Support noted. Consider comments in the development of the policy.
ENV9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV 9 seeks to ensure new development is designed to the highest standard, successful in its function and respectful of the local environment, character and context. Further design guidance is set out in NNDC’s Design SPD which supports architecture and design that retains and reflects traditional architectural values. This is approach is supported, as it aligns with the development and design principles for DS7. Acknowledges the importance of high-quality design, but also recognises that all sites are</p>	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>individual with different characteristics and challenges that require different design solutions. The policy should be worded in such a way to allow this flexibility and should not impose specific design solutions, as per paragraphs 124 and 125 of the NPPF. Furthermore, the design process involves the balancing of issues that sometimes compete, and the policy does not appear to recognise this; it reads as a list of criteria that all development should meet. However, often certain criteria might have to be prioritised due to site-specific challenges. The policy should be framed to recognise this and acknowledge the rationale behind how a particular solution is reached. To be effective and sound, the policy should be clear in its requirements as per NPPF paragraph 16. For example, the need for adaptive and accessible homes is supported, however, Point 10 seeks to “ensure” compliance of an “optional” document. It is suggested that this point is reworded to ensure that development complies with the appropriate national Building Regulations standard.</p>	

Page 25

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

Alternatives

ENV9	Mr & Mrs Johnson (1215700)	AC033	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Partially Supports Assessment ENV9. - Larger properties and/or second homes built by individuals along the NN coast on infill sites are in many cases very poorly conceived and detailed, use inappropriate materials, are of unsympathetic character, too large and in no way serve to enhance the character or appearance of the area. We would welcome a policy to prevent the proliferation of such unsympathetic development.	Comments noted: This comment repeats the support ENV9 made against the First Draft Local Plan (Part 1).
------	----------------------------	-------	---------	--	---

Policy ENV10 - Protection of Amenity

Individuals

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

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

Parish & Town Councils

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

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV10)

Objection	0	Support expressed for the inclusion of external light considerations.
Support	0	
General Comments	1	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV10	Broads Authority (321326)	LP806	General Comments	8.80, 8.81, 8.82 – also mention the Broads and dark skies – we have intrinsically dark skies and a light pollution policy (DM22)	The NNDC LP only covers the areas outside the Broad's consideration however could be given to referencing any approach in the emerging LP for the broad's
ENV10	Environment Agency (1217223)	LP467,468	General Comments	Paragraph 8.84 There are lots of food and drink businesses within the plan area so amenity issues from odours is likely to be our biggest concern. It is important that any potential issues are addressed in the planning process rather than delegating responsibility wholly to the permitting process which may mean it's too late to resolve planning issues. This also allows issues to be flagged at the design stage which is more efficient and less costly. • Policy ENV 10 – Protection of Amenity We recommend that water pollution and the maintenance of water quality is also included within point 8	Noted: Consider comments in the development the policy and future iteration of the Plan.
ENV10	Norfolk County Council (931093)	LP739	Support	Para 8.81 - Consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky lights etc., and be sensitive to the impacts on biodiversity. [More information is available at https://www.bats.org.uk/news/2018/09/new-guidance-on-bats-and-lighting and the Institution of Lighting Professionals (ILP) has published guidelines].	Noted:- Consider comments in the finalisation of the policy
ENV10	Creting and Coast, Mr John	LP606	Support	The policy provides a list of detailed assessment criteria, but not all are discussed within the Design Guide. If these criteria are to be used to assess the	Noted Consider comments in the

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	Fairlie (1217414)			acceptability of a scheme then clear thresholds or guidance should be provided. For example, what is an acceptable level of overshadowing on private amenity space (particularly noting that some shading is now encouraged to support climate change mitigation)? This is clearly covered within the BRE Guide 'Site layout planning for daylight and sunlight: a guide to good practice (BR 209)', but there is no guidance from the Council with respect to what they consider to be acceptable.	finalisation of the policy consider consistency between policy and North Norfolk Design Guide

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

Alternatives

ENV10	Mr & Mrs Johnson (1215700)	AC034	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV10. - Essential. Particularly in respect of noise, disturbance, and erosion of the character of a place.	Comments noted: This comment repeats the support ENV10 made against the First Draft Local Plan (Part 1).
-------	----------------------------	-------	---------	--	--

Policy ENV11 - Protecting and Enhancing the Historic Environment

Individuals

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

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				through and addressed. Further, if the site is allocated in the Part 2 Plan, a full heritage and archaeology assessment will be carried out, to inform future iterations of the layout of the site.
ENV11	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree
ENV11	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: As representatives of a historic market town with a conservation area which covers our town centre, we are extremely sympathetic to Policy ENV 11 and we welcome the resumption of conservation area appraisals for the District as a whole. We would not like to see any weakening of this draft policy.

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

Parish & Town Councils

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

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

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV11	Broads Authority (321326)	LP806	General Comments	8.89 – might need to refer to shared Conservation Areas with us at Ludham, Horning, Stalham and Neatishead.	Noted: Consider clarification in future iteration of the Plan
ENV11	Norfolk County Council: Historic Environment (931093)	LP739	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: For greater clarity and accuracy, we recommend that Section 8 is sub-divided into three categories; Natural Environment (Sub-Categories as listed in the Plan) Built Environment High Quality Design Protection of Amenity Historic Environment Protecting and Enhancing the Historic Environment This structure would give appropriate emphasis to the whole of the historic environment and would ensure that each category title accurately reflected the content of the policies presented within it. PARA 8.3 This paragraph only mentions built-heritage designations (Conservation Areas and Listed Buildings). To be consistent with other parts of the Plan and the Sustainability Appraisal, it should also mention, as a minimum, Scheduled Monuments and Registered Parks and Gardens, and as with 5.15 above, it would be beneficial to mention the importance of non-designated elements of the historic (and natural) environment. PARA 8.85 Suggested changes in red “The Local Plan aims to ensure that North Norfolk's built heritage historic environment is conserved or, wherever possible enhanced and that new development is of high quality design. Paragraph 185 of the NPPF states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”. The NPPF also states that Local Plans should include strategic policies to “make sufficient provision for ...conservation and enhancement of the ...historic environment” (Paragraph 20). The quality of the built environment and the presence of historic archaeological heritage assets make a valuable contribution to the appeal and</p>	Support for Policy ENV11 is noted and welcomed. Consider feedback around supporting section text in the finalisation of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>character of North Norfolk.” PARA 8.86 The importance of all non-designated heritage assets should be emphasised. Suggested changes in red; “There are 81 Conservation Areas, 2265 Listed Buildings, including 94 Grade I and 202 Grade II*, 86 Scheduled Monuments and 33 Historic Parks and Gardens within the District. There are also numerous non-designated heritage assets (comprising both built- and archaeological heritage) including 190 buildings on the Council’s Local List. These are buildings that do not fully meet the criteria for being nationally listed but are considered of architectural or historical importance for the local area. Local Listing does not introduce any additional powers of control, instead it acts as a means of identification and plays an important role in the assessment of development proposals. The effect of an application on the significance of a non-designated heritage asset is a material consideration when deciding planning applications, and, in the case of built-heritage, Local Listing strengthens the case for retention of a historic building. The number of non-designated heritage assets on the list is likely to increase over time as new buildings and other assets are identified. The requirements of the policy equally apply to any local heritage assets identified and listed in adopted Neighbourhood Plans.” POLICY ENV11 – The County Council consider that this is a well-worded policy that makes appropriate reference to the full breadth of the historic environment and acknowledges the importance of non-designated heritage assets. We particularly welcome the inclusion of Point 4 - that the aims of the policy will include, “increasing opportunities for access, education and appreciation of all aspects of the historic environment, for all sections of the community.” This will help to ensure that appropriate levels of public engagement and dissemination are achieved on development-led archaeological projects</p>	

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

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				to include the criteria for Local Listing in an Appendix. It would also be helpful to have more detail in relation to archaeology.	

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

Alternatives

ENV11A	Norfolk County Council: Historic Environment (931093)	LP739	Support	The County Council agree with the Preferred Approach which identifies the need for a policy to ensure a positive approach to the conservation and enhancement of the historic environment. The Alternative Approach (no policy) would not be acceptable.	Support for the preferred approach and dismissal of the alternative is noted
--------	---	-------	---------	---	--

ENV1: Norfolk Coast Area of Outstanding Natural Beauty & The Broads

The purpose of this policy is to ensure that the statutory duty and appropriate high level of protection is given to these designated landscapes through conservation and enhancement of the defined special qualities of the Norfolk Coast Area of Outstanding Natural Beauty and the Broads¹

Local authorities have a legal duty to have regard to the statutory purpose of conserving and enhancing the natural beauty of AONBs and National Parks during plan-making and decision-taking on individual developments. This duty also applies to Parish and Town Councils during the preparation of Neighbourhood Plans. These statutory duties are set out in the National Parks and Access to the Countryside Act (1949) and Countryside and Rights of Way Act (2000) and in which, Areas of Outstanding Natural Beauty (AONBs), along with National Parks are recognised to be of national importance for their landscape quality and, as nationally designated landscapes, are afforded the highest status of protection in relation to landscape, tranquillity and scenic beauty. This is re-affirmed in paragraph 172 of the National Planning Policy Framework (NPPF) which states that great weight should be given to conserving and enhancing landscape and scenic beauty in the Broads and Area of Outstanding Natural Beauty, AONB. As such protection of these scenic requirements along with conservation and enhancement of wildlife and cultural including historic heritage are closely linked and are material considerations for any development proposals located within these areas.

The Norfolk Coast AONB includes the greater part of the remaining unspoiled coastal areas between the Wash and Great Yarmouth covering an area of 453 sq. km. 245.5 sq. km are within North Norfolk and 7.2 sq. km within the Broads Authority (the only example of an AONB overlapping with a national park / equivalent designation). Parts of the Norfolk Coast AONB are within existing built up areas and major towns of the District. Proposals in these areas need careful consideration and will be assessed having regard to their landscape and visual impact on the surrounding area and the wider benefits and public interest that they may bring.

Although both designations are of national importance for their landscape and the specialist habitats that they provide the Norfolk Coast AONB and The Broads are also valuable assets for North Norfolk in terms of character and beauty, sustainable tourism, quality of life and also as wildlife habitats. The designations also extends to include the areas of several growth towns and villages as identified in the settlement hierarchy. The Broads Authority is the Local Planning Authority for the Broads Area and policies in the Broads Local Plan apply there. Development in North Norfolk can however affect the Broads in a variety of ways such as through light pollution, noise, landscape and visual impact and run off affecting water quality. Proposals should therefore carefully consider any direct or indirect effects on The Broads. In the case of development affecting the AONB the Council will expect proposals to have had regard to the content of the AONB's Statutory Management Plan (or successor documents)².

Although the AONB is recognised as a sensitive landscape, development should not be prevented purely on the basis of its designation. Any development proposals within or affecting its setting will have to demonstrate clearly that they are appropriate to the landscape character type and designation. Sites that are suitable for housing outside Local Plan allocations should be developed specifically to meet local affordable and other locally

¹ The Broads has the status of a National Park and in 2016 the High Court and Court of Appeal upheld the Broads Authority decision to use the term 'Broads National Park'. The Broads Authority is the equivalent of a National Park Authority but with some additional powers and responsibilities which include the management of the waterways.

² <http://www.norfolkcoastaonb.org.uk/partnership/2019-24-management-plan-consultation/377>

identified housing needs³. This is not limited to only affordable housing provision but also to ensure wider local needs are met and a wide range of people are able to continue to work and live in the AONB. To do otherwise would fail to address these needs, which could then only be met by releasing more sensitive sites, causing harm and compromising the primary purpose of the AONB designation

National policy⁴ advises that the scale and extent of development within these nationally designated areas should be limited and that major developments should not take place in AONBs except in exceptional circumstances. Footnote 55 of the NPPF advises that whether a proposed development constitutes major development will be a matter for the relevant decision taker, taking into account the individual characteristics and circumstances of the proposal and the local context.

In determining whether a proposed development constitutes major development in the Norfolk Coast AONB is a matter for the decision maker and the Council will consider whether by reason of its scale, form, character and nature, the proposal has the potential to have significant adverse impact on the landscape, wildlife, cultural heritage or special qualities of the AONB and whether it seeks to address the identified housing needs and is in the wider public interest such as helping to address coastal adaptation. Examples of major development may include medium and large scale housing development, commercial development that is out of keeping with the landscape, caravan sites, tall vertical structures, high voltage overhead power lines, renewable energy schemes and quarrying.

Consideration of exceptional circumstances by the Council will include a review of the proposal in relation to:

- The need for the development, including any national considerations, and the impact of permitting or refusing it upon the local economy; and
- The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- Any detrimental effect on the environment, the landscape and recreational opportunities and the extent to which that could be moderated.
- its regard to the objectives of the AONB statutory Management Plan; and
- Alignment with the Key Characteristics, Valued Features and Guidelines set out in the North Norfolk Landscape Character Assessment SPD, 2021
- Opportunities to deliver significant public benefits through the enhancement of landscape features, wildlife, cultural heritage, biodiversity and reinstatement of habitat including , in particular those which contribute to the distinctive sense of place, relative wildness or tranquillity, or to other aspects of landscape and scenic quality.
- Its relevance to the economic, social and environmental wellbeing of the area and it is demonstrated that the proposal is sustainable and appropriately located.

Smaller developments can also be harmful and any development proposals that, by virtue of their scale, design, and/or location, might cause significant adverse impacts on the Norfolk Coast AONB or The Broads will not be permitted other than in exceptional circumstances. Small scale developments that are essential for economic and social wellbeing including meeting local needs, or other uses which are necessary to sustain the area such as

³ This does not apply to development sites allocated by the Local Plan because the need for those developments and scope for them to be accommodated elsewhere outside the Area of Outstanding Natural Beauty was assessed during Plan preparation. Allocated sites address a wider District need and are part of a wider strategy.

⁴ NPPF 2019 para 172

employment and community uses will also need to be well related to existing settlements and in line with other policies contained in the Development Plan.

Consideration should be given to both the individual and cumulative impacts of a proposal in any Landscape and Visual Impact Assessment, which will need to be carried out in line with current best practice. Proposals which would have a significant adverse effect upon the character of the landscape or which would harm the landscape quality, nature conservation interests, geodiversity interests or cultural heritage will not be permitted.

Many of the areas that are likely to experience erosion are either within or in close proximity to the Norfolk Coast AONB. Policy SD 12 '**Coastal Adaptation**' outlines the circumstances in which development can be permitted in the wider Countryside Designation where it replaces that threatened by coastal erosion. As such Development that complies with **Policy SD12** is acceptable in principle within the AONB.

Policy ENV 1

Norfolk Coast Area of Outstanding Natural Beauty & The Broads

The highest degree of protection will be given to the designated landscapes and settings of the **Norfolk Coast Area of Outstanding Natural Beauty** and **The Broads**,

Development proposals should contribute positively and conserve and enhance these valued landscapes and their settings through appropriate siting, scale, massing, materials, and design.

Proposals for major development will be refused, unless exceptional circumstances exist and it can be demonstrated that the proposal is in the public interest.

Proposals located within or within the setting of a protected landscape must demonstrate how they:

- respect the scenic quality and maintain an area's distinctive sense of place, and reinforces local distinctiveness and local landscape character as defined by the North Norfolk Landscape Character Appraisal 2021 SPD⁵, having particular reference to the defined key characteristics and valued features;
- conserve and enhance wildlife and cultural heritage including flora, fauna, and geological features;
- minimise negative impacts on key qualities of tranquillity and sense of remoteness and nocturnal landscape character;
- avoid, mitigate and compensate, for any residual adverse effects;
- are limited in scale and are sustainable and are appropriately located locations;
- are relevant to the economic, social and wellbeing of the area;
- further the delivery of the objectives of the Statutory Management Plans

Development proposals which are considered to have potential adverse impacts on the local landscape character will need to be informed by a Landscape and Visual Impact Assessment undertaken in accordance with current best practice.

⁵ Or subsequent updates

ENV2: Protection & Enhancement of Landscape & Settlement Character

The purpose of this policy is to ensure that development proposals reflect the defining and distinctive qualities of the varied landscape character areas, their key characteristics and valued features and the character, appearance and integrity of the historic and cultural environment of North Norfolk.

The variety, quality and uniqueness of the landscape, both visually and historically, are central to the attractiveness, distinctiveness and diversity of the District. The visual character of North Norfolk's landscapes, seascapes, townscapes, both within and outside of designated areas, is highly valued by residents and visitors. The NPPF recognises that policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of geological value and soils (in a manner commensurate with their statutory status or identified quality)⁶

Nine types and sixteen landscape character areas make up North Norfolk's unique and varied landscape, as defined in the North Norfolk Landscape Character Assessment, 2021 SPD. High priority is given to the protection, conservation and enhancement of the landscape character(s). New development should be well-designed to sustain, enhance and/or create landscapes and townscapes with a strong sense of place and local identity.

The Council will use its adopted Supplementary Planning Documents, SPDs⁷ detailing Landscape Character, LCA, and Landscape Sensitivity Assessments⁸, Conservation Area Appraisals and other relevant evidence to assess the character of the District and its sensitivity to change. Appendix XX details fig 1.3 of the LCA, and sets out a flow chart to assist development proposals and decision making. Development will be supported provided it does not adversely impact the identified intrinsic character and beauty of the District, is informed by the 2021 North Norfolk Landscape Character Assessment, SPD, and separate Landscape Sensitivity Assessment SPD and complies with other relevant policies of the Local Plan.

The Local Plan contains policies relating to specific designations such as the AONB, Undeveloped Coast and Heritage Coast as well as policies on design, green infrastructure, biodiversity & geology, trees and hedgerows coastal management, renewable energy, heritage and nature conservation, and all these policies will contribute towards the conservation and enhancement of the landscape. Policy ENV2 ensures that the landscape qualities of the District are conserved and enhanced to attract and retain people to the area, and that landscape considerations are properly taken into account when new development is planned ensuring great resilience and enhancement.

Development proposals which are considered to have potential adverse impacts on the local landscape character will need to be informed by a Landscape and Visual Impact Assessment, LVIA. Such assessments should follow best practice guidelines, should systematically assess the effects of change on both the individual and cumulative level, and inform proportionate mitigation in order to minimise identified impacts. Proposals which would have a significant adverse effect upon the character of the landscape or which would harm the landscape quality, nature conservation interests, geodiversity interests or cultural heritage will not be permitted.

⁶ NPPF 2019 para 170

⁷ Adopted 2021 and or subsequent updates

⁸ In relation to renewable energy

Many areas of North Norfolk are sparsely populated resulting in dark night skies highlighted as a defining feature of the prevailing landscape character. Development proposals should have regard to nocturnal character and align with the latest government guidance on external lighting along with advice from professional bodies such as the Institute of Lighting Professionals.

Policy ENV 2 Protection & Enhancement of Landscape & Settlement Character

Proposals for development should be informed by, and be sympathetic to: **the key characteristics and valued features** of distinctive Landscape Types and Character Areas, ~~and their strategic objectives and considerations~~ **guidelines** as identified in the **North Norfolk Landscape Character Assessment SPD 2021** and **Landscape Sensitivity Assessment SPD 2021**⁹ and relevant Conservation Area Appraisals. ~~and features identified in relevant settlement character studies.~~

Outside of designated landscapes the Council will support development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design, materials, external appearance and landscaping. Consideration will be given to both the individual and cumulative impacts of a proposal.

Development proposals should demonstrate that their location, scale, design and materials will protect, conserve and, ~~where possible~~, and enhance:

1. ~~the special~~ **defining** qualities and local distinctiveness of the **Landscape Character Type area** ~~(including its historical, biodiversity and cultural character);~~ **including its key characteristics, valued features and qualities (including historical, cultural biodiversity interests) and the relevant vision and landscape guidelines;**
2. ~~gaps between settlements, and their landscape settings;~~
3. **the** distinctive settlement character;
4. the pattern and **quality** of the distinctive landscape features, such as watercourses, woodland, trees and field boundaries, and their function as ecological corridors for dispersal of wildlife;
5. visually sensitive skylines, hillsides, seascapes, valley sides and geological features;
7. the setting of, and **views into** and from the AONB, the Broads, Conservation Areas and **Historic Parks & Gardens; Registered Parks and Gardens;**
6. Nocturnal character;
8. ~~the defined Setting of Sheringham Park, as shown on the Policies Map~~¹⁰

Development should, ~~where possible~~, be directed to areas where the landscape is either not sensitive to change, or is of a lower landscape sensitivity. Where development is proposed in areas of higher landscape sensitivity, applications will be expected to demonstrate how the impact on the landscape will be minimised by appropriate mitigation. In the case that a development is not able to be made acceptable by mitigation measures, such proposals will be refused.

Proposals should **demonstrate** ~~include~~ measures that enable a scheme to be well integrated into the landscape, ~~and~~ enhance connectivity to the surrounding green infrastructure and Public Rights of Way network **and provide biodiversity enhancements** in accordance with Policy ENV 5 'Green Infrastructure' and Policy ENV 8 'Public Rights of Way'

⁹ With particular regard to renewable energy and low carbon development

¹⁰ This can be viewed on the existing Core Strategy Proposals Maps: <https://www.north-norfolk.gov.uk/proposalsmap>

Development proposals which are considered to have potential adverse impacts on the local landscape character will need to be informed by a Landscape and Visual Impact Assessment, LVIA, undertaken to current best practice.

ENV4 Biodiversity & Geology

The purpose of this policy is to protect and enhance biodiversity and geodiversity.

North Norfolk contains a wealth of biodiversity and natural environmental assets and the protection and enhancement of designated areas such as SSSIs and ~~Ramsar~~ **Habitats Sites** is paramount. The Council has statutory duties in relation to their protection (47). Such sites are identified on the Policies Map. In addition, guidance is provided by the Government on how to review planning applications that might affect protected sites and areas (48). Such applications must be assessed in accordance with this guidance **and professional best practice**.

Section 40 of the Natural Environment and Rural Communities Act 2006 imposes a duty on all public authorities to have regard to the purpose of conserving biodiversity (where 'conserving' includes restoring or enhancing a population or habitat). In 2018 the Government indicated that they intend to require developers to demonstrate how they are improving the biodiversity of a site, to deliver a biodiversity net gain (BNG) (49). This is part of an ambition to embed the wider principle of environmental net gain in development. Development that adopts a biodiversity net gain approach seeks to make its impact on the environment positive, delivering improvements through habitat creation or enhancement after avoiding or mitigating harm as far as possible.

The following policy supports this intention. When preparing applications applicants should, in accordance with the mitigation hierarchy, consider the potential effects of the proposal on biodiversity; demonstrating how potential effects have been avoided, and where this is not possible, adequately mitigated for. Any residual harm, after all measures to prevent and adequately mitigate have been applied, must be adequately compensated for. Biodiversity net gains and contribution to ecological networks should be sought for all development, proportionate to the scale of the proposal and any potential impacts. A development with limited or no impacts on biodiversity should still seek to demonstrate a biodiversity net gain wherever possible. This will include, but not be limited to, the protection of features such as trees, hedgerows, ponds, meadowland and woodland, designing buildings to include roosting or nesting spots and including landscaping within sites and along boundaries which can provide feeding and nesting opportunities as well as acting as habitat corridors aiding the passage of wildlife between sites.

Biodiversity is essential to sustain our society and economy. Enhancing biodiversity is integral to sustainable development and BNG is an approach to embed and demonstrate biodiversity enhancement within development.

(47) Circular 06/2005 Biodiversity & Geological conservation – Statutory obligations and their impact within the planning system.

(48) <https://www.gov.uk/guidance/protected-sites-and-areas-how-to-review-planning-applications> accessed on 11/12/18.

(49) Net gain consultation proposals, DeFRA Dec 2018.

It involves first avoiding and then minimising biodiversity loss as far as possible, and achieving measurable net gains that contribute towards local and strategic biodiversity targets. Its application should be proportionate to the scale of the development and its effects on biodiversity and in accordance with best practice principles and relevant standards.

BNG does not apply to statutory sites or irreplaceable habitats, in which impacts should be avoided where possible or addressed as fully as possible by adhering to the mitigation and legislative requirements on a case by case basis. It is possible to achieve BNG for small scale development and those where there is little or no impact on biodiversity. Small-scale development proposals form a significant proportion of the planning applications received by this authority and collectively these applications could make a notable contribution to BNG. BNG must be measurably demonstrated for development using a recognised calculation methodology. The Defra Biodiversity Metric V2 is the most established and commonly used metric to measure BNG and it is recommended that this be used to measure BNG for development.

The highest level of protection will be given to International and European sites, with development only permitted where the proposal is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) or any successive Regulations. Any development with the potential to impact on a Special Protection Area (SPA), Special Area for Conservation (SAC) or Ramsar site will need to be supported by information to inform a Habitat Regulations Assessment, in accordance with the Conservation of Habitats and Species Regulations 2017 as amended (or subsequent revisions). Measures to mitigate for potential adverse effects on European sites are required, the proposed mitigation measures must be justified as fit for purpose with appropriate evidence and prepared with the best available factual information, to inform the relevant Habitats Regulations Assessment.

All residential (including tourist accommodation) development has the potential to result in a significant increase in recreational disturbance at the Norfolk Habitats Sites. Measures required to mitigate the impacts of recreational disturbance on Habitats Sites will be delivered as detailed in the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (RAMS). Residential development has the potential to affect the integrity of Habitats Sites and will be required to either contribute towards mitigation measures identified in the RAMS (or any subsequent Supplementary Planning Document) or, in exceptional circumstances, identify and implement bespoke mitigation measures in perpetuity to ensure compliance with the Habitats Regulations

Proposals should particularly seek to contribute towards the objectives for priority habitats and species (50) ~~identified in the Norfolk Biodiversity Action Plans (BAP)~~ and to the protection, enhancement and linking of core areas identified in the North Norfolk Green Infrastructure Strategy (NNGIS), which ~~has~~ **have** evolved from the earlier Ecological Network mapping for the District **and/or successive Nature Recovery Networks as identified in the 25 year Environment Plan or successive plans.**

(50) Habitats and species of principle importance - Section 41 of the NERC Act 2006, Norfolk Biodiversity Action Plan habitats and species, Biodiversity 2020, and 25 Year Environment Plan

The enhancement and expansion of the existing resource will be a priority. There is a need to expand and re-connect existing areas and restore habitats where they have been destroyed. In North Norfolk these include increasing woodland, heathland and wood pasture in the Cromer Ridge area and management of the Broads margins to develop semi-natural habitats

including heathland. The Council's Landscape Character Assessment 2018 also provides guidance on appropriate landscape and habitat creation.

The Norfolk Biodiversity Information Service can provide **habitat and general** species distribution data **to inform Ecological Impact Assessments required** for development. ~~sites and further information is also available from the Norfolk Wildlife Trust and the Norfolk Biodiversity Partnership.~~ Natural England can provide detailed information **and advice through their Discretionary Advice Service** regarding ~~sites of geological importance~~ **designated and protected sites.**

Where necessary, applications must be supported by an Ecological Impact Assessment (EclA) in accordance with BS42020:2013 and CIEEM Best Practice Guidelines. The EclA will need to include the results of all surveys and assessments that are deemed necessary by a Suitably Qualified Ecologist; a non-technical summary is provided of the net losses and gains for biodiversity of the development to provide clarity and certainty regarding the ecological impacts of the development and any necessary mitigation or compensation in order that the Local Planning Authority has sufficient information to make a decision.

The Shoreline Management Plan (SMP) identifies areas that could become permanently flooded under different options for long-term coastal realignment. If this occurs, then opportunities for creating new habitats in these areas will be taken where possible and replacement habitats may need to be provided to ensure no net loss of important habitats. This is especially important for The Broads National Park which contains habitats of international significance.

Policy ENV 4

Biodiversity & Geology

Development proposals where the principal objective is to conserve or enhance biodiversity or geodiversity interests of European, international, national and local nature conservation designations will be supported in principle.

A) All development proposals will be expected to:

1. provide a suitable ecological survey to establish the extent of potential impact where there are grounds to believe that ancient woodland, veteran trees, protected species (*1), priority species or priority habitat (*2) may be affected during and after development;
2. retain, protect and buffer ecological and geological features and provide for the appropriate management of those features;
3. deliver a measurable biodiversity net gain;
4. incorporate biodiversity enhancement features, by designing-in provisions for wildlife, including the provision of nests and roosts (*3); and
5. avoid the net loss or fragmentation of habitats and support the creation of coherent ecological networks in urban and rural areas and through Nature Recovery Networks.

Where the adverse impacts of development on biodiversity are identified, they must be proportionately addressed in accordance with the mitigation hierarchy of:

- i. Avoidance;
- ii. Mitigation;
- iii. Compensation

The Council will secure effective avoidance, mitigation and compensation through the imposition of planning conditions or planning obligations as appropriate including monitoring for the effectiveness of these measures.

Where the requirements of this hierarchy cannot be met, development will be refused.

B) International (*4) and European (*5) Designated Sites

Development will only be permitted where the proposal is in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) or any successive regulations, determining site specific impacts and avoiding or mitigating against impacts where identified.

Where appropriate, contributions from developments will be secured towards mitigation measures as identified in the Norfolk Green Infrastructure and Recreational Impact Avoidance & Mitigation Strategy (RAMS).

C) Nationally (*6) and Locally (*7) Designated Sites

Development likely to have a direct or indirect adverse effect will only be permitted where it can be demonstrated that the need and benefits of the development clearly outweigh both the adverse impacts of the notified special interest features of the site and any adverse impact on the wider network of natural habitats.

(*1) Including but not limited to those species protected under the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 (as amended) and the Protection of Badgers Act 1992.

Appendix 2 Emerging Policies Discussion Draft PPBHP

(*2) Those identified in the 25 Year Environment Plan, the England Biodiversity 2020 Strategy, habitats and species of principle importance in Section 41 Natural Environment and Rural Communities Act 2006, habitats and species in the Norfolk Biodiversity Action Plan and any subsequent successor plans.

(*3) These include, but are not limited to: integrated swift boxes, house martin cups, sparrow terraces, integrated and external bat boxes, owl boxes, connected spaces for hedgehogs eg. 'Hedgehog Highways' and other mammals and hibernacula.

(*4) Ramsar (sites designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran 1971)

(*5) Any site included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 (as amended) for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites

(*6) Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNR) and Marine Conservation Zones (MCZs)

(*7) Regionally Important Geological Sites, Local Nature Reserves, County Wildlife Sites, Ancient Woodland and Roadside Nature Reserves

ENV5 Provision of Green Infrastructure

The purpose of this policy is to safeguard, retain and enhance the network of green infrastructure.

National policy says that strategic policies should make sufficient provision for the conservation and enhancement of green infrastructure and should identify the strategic location of existing and proposed green infrastructure networks. ~~To assist in planning positively for green infrastructure local planning authorities may wish to prepare an authority-wide green infrastructure framework or strategy. This should be evidence-based by, for example, including an assessment of current green infrastructure provision that identifies gaps in the network and the components and opportunities for improvement.~~

Green infrastructure is a strategic network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities. It is an important part of our communities and contributes towards the identity of North Norfolk. **As set out in the Planning Practice Guidance, Green Infrastructure can embrace a range of spaces and assets, including parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and 'blue infrastructure' such as streams, ponds, canals and other water bodies.**

This policy has been informed by the contents of the Green Infrastructure Background Paper and **the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy.** ~~Both of these documents set out Background Paper provide a strategic approach towards improving the existing green infrastructure network and by will ensuring the right types of green spaces and access are provided and enhanced where they will provide the greatest benefit. The Background Paper brings together key findings set out in the Council's evidence base which has been used to identify existing issues and opportunities related to green infrastructure.~~

This policy provides for the network of green infrastructure in North Norfolk to be safeguarded, retained and enhanced ~~in line with the Green Infrastructure Background Paper.~~ **In line with the policy ENV7 Open space provision, the Norfolk Recreational Impact Avoidance and Mitigation Strategy, RAMS and policy ENV4a, local open space and enhanced green infrastructure is to be incorporated into appropriately sized proposals. Proposals of 50 dwellings or more should**

incorporate additional enhanced green infrastructure with the aim of providing areas attractive enough for local recreational use on or near where new homes are built that can deflect people away from Habitats Sites for recreation. Collectively development should seek to maximise opportunities for the restoration, enhancement and connection of the District's green infrastructure network throughout the lifetime of the development, both on-site and for the wider community in line with the principles, priorities and action plans detailed in the North Norfolk Green infrastructure Background paper, any subsequent SPD and the Norfolk Green Infrastructure Recreational impact Avoidance Strategy.

The Background Paper **currently** focuses on the GI opportunities for the major growth towns of Cromer, Fakenham and North Walsham and informs the site allocation proposals. The key green infrastructure improvements for the three major growth towns are illustrated on the green infrastructure settlement maps which show where existing green infrastructure is located, an overview of key findings in the area and a number of actions to improve green infrastructure. **Enhanced green infrastructure, EGI, is in addition to any local open space policy requirements identified in ENV7 and should be at such a proportionate scale and standard, as outlined in the GI/RAM Strategy and be at a scale and quality able to divert and deflect visitors from Habitat Sites. Such green infrastructure is often referred to as Suitable Alternative Natural Greenspace (SANGS). SANGS are usually one area of an alternative attractive semi-natural environment but in the context of the Norfolk GI/RAMS, EGI is proposed as an alternative to a SANG and can incorporate a network of open spaces, permissive routes and natural or semi-natural environments across a given area. Enhanced Green Infrastructure should be incorporated into to existing open spaces and or provided through opportunities for new EGI provision and specific EGI project/target areas.-The GI/RAMS identifies a number of Strategic Opportunities Areas (SOA), which could be developed to meet an enhanced standard and help act as genuine alternatives to the existing recreational destinations and help rectify deficiencies in existing provision.**

The Public Rights of Way network allows people access to enjoy North Norfolk and in the process can make a contribution towards improving their health and well-being. The Public Rights of Way network can also provide an alternative to car use for some journeys by forming an important component of the District's overall sustainable transport network, providing access on foot or by cycle to the wider countryside, services and facilities.

The NPPF at paragraph 28 states that Planning Policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.

Where the location and scale of new development requires connections and / or could lead to the increased use by new and existing residents, there may be a need for improvements to the Rights of Way network in order to encourage more walking, cycling and horse riding through improved accessibility, surfacing and / or connectivity. Where this is the case, the Council will secure appropriate contributions from the applicants. Particular consideration will be given to connecting development sites with open spaces, leisure / community uses and strategic access routes, making links within the wider Rights of Way network or to creating circular or extended routes. England Coastal Path and Coastal Margin

The England Coast Path is a new long-distance trail that will eventually allow people to walk around the whole of the English coast, designated under the CROW and Marine and Coastal Access Acts. Natural England has a statutory duty to provide this path and expects the path to be complete in 2020. The designation of Coastal Margin land enables spreading room for the coastal trail and aims to ensure the public enjoyment of this area by establishing new rights

of access and to make the extent of people's access rights clearer and more cohesive on the ground.

Paragraph 168 of the NPPF states that Local Planning Authorities should ensure that development does not hinder the creation and maintenance of a continuous signed and managed route around the coast, (as required by the Marine and Coastal Access Act 2009).

Part 9 of the Marine and Coastal Access Act 2009 ("the 2009 Act") aims to improve public access to, and enjoyment of, the English coastline by creating clear and consistent public rights along the English coast for open-air recreation on foot. It allows existing coastal access to be secured and improved and new access to be created in coastal places where it did not already exist. Section 296 of the Act places a duty on Natural England and the Secretary of State to use their powers to secure the twin objectives: To secure a route round the whole of the English coast (an approved mapped line not a physical path); and, To secure an associated margin of land for the public to enjoy.

The margin includes all land between the trail and the sea. It may also extend inland from the trail if: it is a type of coastal land identified in the Countryside and Rights of Way Act 2000 (CROW Act), such as beach, dune or cliff there are existing access rights under section 15 of the CROW Act Natural England and the landowner agree to follow a clear physical feature landward of the trail.

Collectively the approach aligns with the wider Local Plan objectives and in particular objective 6.6 where the aim is to provide improved open space provision, access and connectivity across the Districts network of green infrastructure in order to ensure it functions as a strategic multi- functioning network, facilitates increased walking and cycling, improves the accessibility of new homes and contributes to health communities as well as deflecting pressures and avoiding adverse impacts on the existing Habitat Sites from recreational pressure.

Policy ENV 5

Green Infrastructure

All Development proposals will be expected to fully incorporate green infrastructure principles into proposals, including the enhancements and opportunities identified in the Green Infrastructure Background Paper and where appropriate the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and any future guidance/strategies adopted by the Council and will provide a detailed scheme for:

1. the provision and delivery of new green infrastructure; and
2. the mitigation and enhancement of existing green infrastructure; and
3. improving green infrastructure connectivity; and
4. include a maintenance and management strategy.

Where it can be clearly demonstrated that green infrastructure cannot be delivered on site then contributions will be required to deliver enhancements and mitigation to existing green infrastructure close to the site.

Enhanced Green Infrastructure

In line with the Norfolk Recreational Impact Avoidance and Mitigation Strategy proposals of 50 dwellings are required to provide additional Enhanced Green infrastructure as identified in the Norfolk Green Infrastructure & Recreational Impact Avoidance and Mitigation Strategy and any subsequent SPD.

Public Rights of Way

Public Rights of Way and access will be protected, enhanced and promoted. New development should create convenient and attractive links within development and to the surrounding area, assist with creation of a network of accessible greenspace and provide links to public transport and walking and cycling networks.

Development will not be permitted if it would hinder the creation, maintenance or planned investment in a continuous signed and managed route around the English coast (*1).

(*1) As required by the Marine and Coastal Access Act 2009.

ENV6 Trees, Hedgerows & Development

The purpose of this policy is to protect trees, hedgerows, woodland and other natural features from harm, including loss and deterioration and to provide compensatory replacement provision where necessary.

Trees, hedgerows, woodland and other natural features form an essential part of North Norfolk's landscape character, enhancing the aesthetics of an area, the quality of the environment, providing a habitat for a range of wildlife and providing important ecological corridors or 'stepping stones' through the landscape for a variety of species for commuting or foraging. They can also have many other benefits including providing shade, stabilising soil, helping to reduce noise, and prove beneficial in terms of atmospheric filtering air pollution and flood mitigation. As such, the planting of new trees and woodland across the district will be positively encouraged in order to mitigate against the impacts of Climate Change and to enhance the character and appearance of the area.

Where new development is proposed the preference will always be to incorporate existing natural features into the development. In exceptional circumstances where the benefit of development is demonstrated to outweigh the benefit of preserving natural features, development will be permitted subject to adequate compensatory provision being made, preferably by native ~~British~~ species of commensurate **biomass and** value to that which is lost.

Many trees in the District have protected status, under the designation of Tree Preservation Orders (TPO) or by being situated within a Conservation Area. A TPO is an order made by the Local Planning Authority (LPA) in England to protect specific trees, groups of trees or woodlands in the interest of amenity. ~~A TPO prohibits cutting down, topping, lopping, uprooting, willful damage and willful destruction of trees without prior written consent of the LPA.~~ **The NPPF defines an 'ancient' or 'veteran tree' as "A tree which, because of its age, size and condition, is of exceptional biodiversity, cultural or heritage value". 'Ancient trees' are usually older than the majority of trees of the same species in the same geographic area, whilst a 'veteran tree' is one with similar characteristics to an ancient tree, but not necessarily ancient in years.**

Harm to protected trees includes, but is not limited to, excessive pruning, incursion in the root protection area, alterations to ground levels or complete removal of the tree. Planning permission will only be granted where development would not conflict with the purposes of the preservation order of a tree, group of trees or woodland unless there is a substantiated justification.

Where a proposed development retains existing trees and hedgerows on-site, or where development occurs within a tree root protection area, provision must be made for their care and protection throughout the duration of the development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees. A satisfactory arboricultural impact assessment should be submitted in accordance with BS5837 (or the equivalent applicable standard should this be superseded over the plan period), which sets out these details.

Proposals must also take into account the longer-term relationship between trees and a development. In some circumstances, even when a development can be physically constructed without resulting in harm to a tree, the proximity and liveability of the development with the tree can result in long-term pressure for the tree to be constantly pruned or even felled.

Policy ENV 6

Trees, & Hedgerows & Development

The retention and incorporation of existing and/or new trees and hedgerows within a proposal will be supported. The planting of new trees, hedgerows and woodland throughout the district having regard to the North Norfolk Landscape Character Assessment will be encouraged;

- (i) to mitigate against the impacts of climate change;
- (ii) to enhance the character and appearance of the district;
- (iii) to improve the green infrastructure provision and ecological connectivity, where it would not conflict with other nature conservation interests.

A) Protected trees, hedgerows and woodland

Development that will harm or require the loss of a protected tree, (s) or hedgerow(s) or woodland (*1) and trees classified as being of categories A or B in value (BS5837:2012) will only be permitted in exceptional circumstances where it would allow for a substantially improved overall approach to the design and landscaping of the development where the public benefit of the development would clearly outweigh the loss or deterioration of any tree, or hedgerow or woodland. In such circumstances, where the loss of such features is demonstrably unavoidable, adequate replacement provision, taking account of size, comparable biomass and preferably by native species, will be required. In these circumstances, developers will be required to ensure that the loss will be suitably compensated for, taking into account the size and condition of the tree.

B) Other Natural Features

Harm or loss to any natural landscape feature will not be permitted unless a landscape strategy, which would compensate for the loss or harm, is secured or where the overriding benefits arising from the development outweighs the harm.

Where a proposed development retains existing trees and hedgerows on-site, or where development occurs within a tree root protection area, provision must be made for their care and protection throughout the duration of the development with mitigation measures being put in place to ensure that development works do not have a harmful impact on existing trees.

(*1) Includes preserved trees and woodland, protected hedgerows, trees in Conservation Areas, ancient trees and woodland, aged and veteran trees and any other tree of category A or B as per BS 5837:2005 (as amended).

ENV 9 High Quality Design

The purpose of this policy is to provide a set of design principles which when followed will result in improved design and ensure the special character and qualities of North Norfolk are maintained and enhanced.

The National Planning Policy Framework states that “the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this”.

The Framework states that permission should be refused for development of poor design that fails to take the opportunities available to improve the character and quality of an area and the way it functions, taking into account any local design standards or style guides in Plans or Supplementary Planning Documents. The Council is currently producing a

replacement North Norfolk Design Guide which is published for consultation alongside this Draft Plan.

North Norfolk has an exceptionally rich and diverse built and natural environment. The interaction between people and place has resulted in the District's unique qualities that we see today. Design is not just about how a place looks, but also how a place functions; well-designed developments improve the functionality of places and create high quality environments that can be enjoyed by residents now, and in the future. Securing high quality design is important in achieving many of the essential wider aims and objectives under the umbrella of achieving sustainable development. Securing high quality design contributes to quality of life and influences our health and well-being. High quality design reinforces or creates a sense of place, making North Norfolk a better place to live, work and spend time. Well-designed places encourage social interaction, helping to create inclusive communities, providing equal access to opportunities, services and facilities, whilst reducing opportunities for crime and promoting natural surveillance of the public realm and open spaces.

The North Norfolk Design Guide Supplementary Planning Document provides guidance on how design should complement local architectural traditions and how sustainable construction techniques can be incorporated within the context of the quality and character of the existing built heritage. Conservation Area Appraisals and the Landscape Character Assessment provide a more detailed local context for the consideration of development and should also be taken into account where they have been produced. There will be reviews of such statements during the lifetime of the Plan and the most up to date material should be referred to.

Design and Access Statements are required to be submitted with all major planning applications and these should demonstrate how a proposal is functional, attractive and accessible to all. The criteria in 'Building for Life', as referenced in Paragraph 129 of the NPPF, **and the updated criteria in 'Building for a Healthy Life'** ¹¹ are useful for considering character, public space, design and construction and the surrounding environment and communities and developers are encouraged to incorporate these principles in proposals.

In October 2019 the Ministry for Housing Communities and Local Government produced a National Design Guide¹², which provides detail on the ten characteristics of good design. This guidance should be incorporated in proposals. Any subsequent urban design good practice guidance or similar that the Council wishes to endorse will be made available on the Council's website and should be incorporated into proposals.

~~alongside any further urban design guidance that is endorsed by the Council will be referenced through the Council's website, which will be updated as guidance continues to be published.~~

The Council may encourage design reviews to take place during the assessment of large and complex sites and encourages early engagement in line with Paragraph 128 of the NPPF and will facilitate constructive dialogue at the pre-application stage.

Paragraph 79 of the NPPF states that planning policies and decisions should avoid the development of isolated homes in the countryside "unless the design is of exceptional quality, in that it: is truly outstanding or innovative, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural area; and

¹¹ https://www.udg.org.uk/sites/default/files/publications/files/14JULY20%20BFL%202020%20Brochure_3.pdf

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area". Due to the rural nature of the district it is envisaged that there will be a number of Paragraph 79 applications. When considering these applications the Council would expect that the standards of design would be above and beyond the typical high levels of design expected of all development within the district. Further detail is to be provided through the North Norfolk Design Guide.

The Council intends that this policy relates to all forms of development within the District to ensure that the highest design standards are applied equally across all development throughout North Norfolk. Through this Plan the Council is seeking to deliver approximately 5,000-6,000 new dwellings on large sites and, as a result, many of these proposed allocations will include an element of affordable housing. Where this is the case, it is the intention of the Council that the design principles, as set out within this policy and supported by the guidance in the North Norfolk Design Guide, are equally applied to both market dwellings and all types of affordable housing. In terms of design there should be no difference between market and affordable dwellings.

The Council's design policy and supporting planning documents are intended to introduce a step change in the design aspirations for the District. In line with the changes to the NPPF and the increased focus upon promoting high quality design, the policy seeks to incorporate a number of key urban design principles which must, where possible, be incorporated into all schemes:

Quality of the Public Realm

For places to work and foster sustainable communities it is important that the public realm is of high quality, feels safe, is vibrant, is inclusive to all social groups, and is adaptable to the changing needs of the community. This can be achieved through: Locating public spaces on main lines of movement and pedestrian connection nodes; ensuring that spaces present imaginative, high quality design and contribute to the District's wider green infrastructure framework; ensuring that spaces and routes are overlooked from surrounding buildings, with active frontages onto spaces, where appropriate; creating incidental and/or small areas of grass/open space should be used to complement green infrastructure and the overall movement network; prioritising the retention of key natural features, such as mature trees, hedgerows and land forms; provide new trees, including street trees, hedgerows and additional native species planting as part of the overall landscaping framework throughout a site; strengthening and protecting existing boundary hedgerows around the site; providing appropriate landscaping and screening to aid residential amenity; and reducing the potential impact of artificial light pollution and its effects on wildlife and the rural setting.

Landscape and Green Infrastructure

The importance upon the spaces around new development should not be underestimated in the design of new development. Good landscaping can actively enhance, complement, soften or even obscure development as necessary. The landscape of North Norfolk gets its unique identity from the natural setting and historical development. New development should respect, respond and enhance this unique landscape character. New development should share common characteristics with its locality and reinforce local identity as well as providing well designed accessible landscapes and public open spaces.

Movement and Connectivity

In considering the potential of new development, making the right connections into and out of the site is a major component of place-making. The distribution and hierarchy of streets have an important relationship with distribution of land uses, density and pattern of activity.

Creating new walking and cycling routes and connecting to the existing walking and cycling network by the simplest and most direct way should be a major consideration and priority in all new developments in North Norfolk.

Important approach routes have been identified on the Policies Maps which provide important views while travelling into a settlement. These have been selected on the basis of their 'gateway' function for visitors of the wider settlement. Development proposals along these routes should have particular regard to their setting. The Government publication 'Manual for Streets' aims to assist in the creation of high quality residential streets and should be used in such proposals.

Character

Respecting the rural and historic character of much of North Norfolk, it is important that new proposals preserve or enhance the historic environment and/or respect or improve the local character. This can be achieved through careful design, incorporating high quality details and materials **that respect and reflect the character of the area** and through careful consideration of layout, form, style, massing, scale, **and density and the local vernacular.**

~~The draft North Norfolk Design Guide sets out the guidance as to minimum densities both in terms of location and in terms of scale of development. A summary of this is set out as follows:~~

- ~~• Urban Centre: 30-50dph~~
- ~~• Urban Fringe: 20-40dph~~
- ~~• Village Centre: 15-35dph~~
- ~~• Village Fringe: 10-30dph~~

~~In terms of conformity with the spatial strategy of the Local Plan, the term 'urban' relates to Large and Small Growth Towns and 'village' refers to Service Villages and Infill Villages. Further detail can be found in the North Norfolk Design Guide.~~

Safety

'Secured by Design' principles are expected to be incorporated within all schemes. This will require particular consideration to layout of the development to increase natural surveillance, layout of roads and footpaths, appropriate planting, specific consideration of the use/misuse of open space and secure standards of doors and windows for example. Further advice on 'Secured by Design' is available from Norfolk Constabulary. In town centres covered by CCTV systems, developers will be required to consider these facilities in their design and / or contribute to the siting / re-siting of cameras where appropriate.

Amenity

Residents have the right to adequate privacy levels and to be kept free from excessive noise, odours and unwanted social contact. The Council will therefore look for layouts to take account of the position of dwellings and the arrangement of their rooms and windows and private amenity space.

Accessibility and Adaptability

The District has one of the highest percentage of over 65s in the country. The population is aging and the trend is accelerating. There is a historic deficit and lack of accessible and adaptable properties across all tenures in the District with the greatest requirement remaining in the private sector. Given the District's increasing older population structure and high proportion of older, smaller traditional housing stock, it is important that the supply of accessible and adaptable homes is significantly increased. With public health and social care strategies placing more emphasis on supporting people in their own homes rather than moving to residential care it is also important that the Council seek to ensure that more accessible homes are provided in the district and that adaptations are easier and cheaper to undertake.

Space Standards

The size and layout of new dwellings have an important influence on health and well-being as well as future adaptability and with the aging population in North Norfolk is an important consideration for the Local Plan. The nationally described space standards deal with internal space within new dwellings across all tenures. The standard sets out the minimum requirements for the Gross Internal (floor) area of new dwellings at a defined level of occupancy as well as floor area and dimensions for key parts of the home, e.g. bedrooms, storage and floor to ceiling height. Utilising these optional technical standards allows the Council to seek to increase the dwelling sizes in relation to property sizes where there is the greatest need, ensuring that properties across the District are built to meet expectations and new dwellings continue to have a positive impact on Local plan delivery targets.

Climate Change & Energy Efficiency

Delivering sustainable development and adapting to climate change includes the requirement to minimise demand for resources and mitigate the impacts from climate change. With the focus on the quality of homes in the NPPF, the national emphasis on more energy efficient homes and the aim of zero carbon homes, local authorities can play a role in incentivising industry to help meet the national carbon reduction targets as well as increase long term sustainability and people's well-being. In relation to managing SuDS, consideration should be given to the four pillars of Water Quantity, Water Quality, Amenity and Biodiversity, and taking into consideration multi-functional benefits of land use and materials such as permeable materials to aid infiltration and green roofs for storage.

Public Art

Public art is recognised as having a significant role in creating successful places and establishing vibrant communities. Public art has the ability to make buildings and places more distinctive, attractive and legible.

Parking

Parking provision and parking within the streetscene can have a significant bearing on the character and appearance of an area and its functionality. Parking can tend to dominate streets, weaken the sense of enclosure and erode urban design qualities. Imaginative solutions are therefore required to respond to the challenge. Parking has to be designed carefully and parking capacity needs to be flexible.

Electric Vehicle Charging Infrastructure

The level of provision of electric vehicle charging points should be appropriate to the development size and type, its level of parking provision and its context and location. In the case of car parks, upstanding or inset charging points can be integrated into the design,

whereas more innovation may be required for on-street charging points which should be integrated into street lighting columns or other smart street furniture items so as to reduce street clutter.

Major development design principles

New para: Major Development is defined within the NPPF for residential development as development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Whilst all development must accord with the overall design principles of this policy, minor developments, extensions and alterations etc. would, by their nature, may not be able to address all of these principles.

Further detail on the specific application of these design principles can be found in the North Norfolk Design Guide.

Policy ENV 9

High Quality Design

All development proposals should seek to make efficient use of land, but whilst reflecting the characteristics of the site and the local surrounding area in their terms of layout, landscaping, density, mix, scale, massing, character, materials, finish and architectural details.

All development proposals should respond to current best practice and demonstrate that they are in conformity with the design principles set out in established 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.

The Council will expect proposals for all development and other works to comply with the North Norfolk Design Guide, and successor documents, or provide justification for a departure from the guidance. demonstrating a high quality of design that:

Major Development

All proposals for major development will be expected to demonstrate a high quality of design that:

1. contributes positively to the public realm and public spaces; creating high quality, sustainably designed places and spaces that maximise uses and activities;
2. retains existing important landscaping and natural features, in accordance with Policy ENV2 'Protection & Enhancement of Landscape & Settlement Character', and includes landscape enhancement schemes that are compatible with the Landscape Character Assessment and ecological network mapping;
3. provides opportunities to enhance the green infrastructure network across the District in accordance with Policy ENV 5 'Green Infrastructure'
4. maximises connectivity, creating a movement hierarchy which is legible, permeable and well connected;
5. incorporates footpaths, cycle paths, green links and networks to the surrounding area, respecting important approach routes;

6. preserves or, where possible, enhances the special character of the historic environment in accordance with Policy ENV 11 'Protecting and Enhancing the Historic Environment' and relevant Conservation Area Appraisals;
7. integrates, to a high degree of compatibility with the surrounding area, in terms of: layout, form, style, massing, scale and density, ensuring that development makes efficient use of land while respecting the distinctive local character;
8. reduces opportunities for crime, terrorism and antisocial behaviour, creating safe, secure and accessible environments reflecting principles of Secured by Design;
9. provides appropriate private amenity space, and, where appropriate, includes facilities for refuse, recycling and servicing, whilst respecting residential amenity of both new dwellings and nearby occupiers in accordance with Policy ENV 10 'Protection of Amenity';
10. ensures that development is designed in accordance with the Council's Optional Technical Housing Standards as set out in 'Accessible & Adaptable Homes';
11. incorporates sustainable construction principles contained within Policy HOU 11 'Sustainable Construction, Energy Efficiency & Carbon Reduction';
12. maximises the opportunities for the provision of Sustainable Drainage Systems (SuDS) taking into account the multi-functional benefits of compatible land uses and materials as detailed within Policy SD 10 'Flood Risk & Surface Water Drainage';
13. incorporates public art into schemes; and,
14. provides adequate parking provision that is discreet and accessible in line with Policy SD15 'Parking Provision'.

Small scale development, including extensions and alterations

Small scale development including extensions and alterations will be expected to demonstrate a high quality of design in accordance with the criteria 1-14 where applicable

ENV 10 Protection of Amenity

The purpose of this policy is to maintain, protect and promote ~~amenity~~ **adequate living and working conditions for** ~~of~~ the District's communities in order to ensure that **all occupants'** ~~residents~~ benefit from a good standard of amenity.

For the purposes of this policy 'amenity' is defined as those desirable features of a place that ought to be protected or enhanced in the public interest. The Council will expect **all** development to avoid harmful effects on the amenity of existing and future occupiers and nearby properties or, where this is not possible, to take appropriate measures to minimise potential negative impacts.

The potential impact of development needs to be considered both on an individual, as well as cumulative, basis. **The NPPF is clear that** the continuance of existing businesses, **which are already established in a locality**, should not have unreasonable restrictions placed on **them** ~~to~~ because of the introduction of new and incompatible land uses. Such matters will be an important planning consideration in relation to amenity.

In relation to new residential development, it is important to also highlight that homes must be designed to meet the minimum space standards set out in Policy HOU 9 to ensure that they will offer a reasonable level of residential amenity and quality of life.

Private Amenity Space

Provision will be made for adequate external private amenity space which is appropriate for and integral to any new residential development. Any applications for

conversions to residential will also need to make provision for adequate external private amenity space or demonstrate why this may not be feasible.

Privacy and Outlook

A development's impact upon ~~visual privacy,~~ and outlook ~~and disturbance from artificial light~~ can be influenced by its design and layout and can affect the amenity of existing and future occupiers. The Council will expect that these elements are considered at the design stage of a scheme. Further detail on amenity can be found within the North Norfolk Design Guide.

Sunlight, Daylight and Overshadowing

Loss of sunlight and daylight can be caused if spaces **and buildings** are overshadowed by development. To assess whether acceptable levels of daylight and sunlight are available to **indoor** habitable **spaces, as well as** outdoor amenity and open spaces, ~~regard should be given to~~ in conformity with the guidance set out ~~within~~ the North Norfolk Design Guide.

Artificial Lighting Levels

The North Norfolk coast boasts some of the darkest skies in the country. The lack of artificial light helps the coast retain its rural character and overall tranquility. The Norfolk Coast Area of Outstanding Natural Beauty (AONB) Partnership have, as part of their 20 year vision, a vision for the area that sets out "...[that] the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquility, with wide skylscapes, seasclapes and dark night skies that show the richness and detail of constellations."

To date, two locations in North Norfolk (Wiveton Downs and Kelling Heath Holiday Park) have been awarded Dark Sky Discovery Site status and special attention should be given to these areas and the wider AONB. Lighting in new development should be limited to that necessary for security. Consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky lights etc.

National Planning Practice Guidance provides further advice on how to consider light within the planning system, in particular, setting out the factors to be considered when assessing whether a development proposal might have implications for light pollution. Further detail regarding artificial lighting can be found in the North Norfolk Design Guide.

Noise and Vibration

Noise and vibration can have a major effect on amenity. The World Health Organisation (WHO) states that excessive noise can seriously harm human health, disturb sleep and have cardiovascular and behavioural effects. Where uses sensitive to noise are proposed close to an existing source of noise or when development that is likely to generate noise is proposed, the Council will require an acoustic report to accompany the application.

Odours, Fumes and Dust

Odours, fumes and dust can be generated from commercial cooking, industrial process and construction and demolition which have the potential to cause a range of health

problems, including respiratory diseases. We will require all development likely to generate nuisance odours to install appropriate extraction equipment and other mitigation measures. These should be incorporated within the building where possible. External extraction equipment and ducting should be sited sensitively, particularly on listed buildings and within conservation areas. Further detail on amenity can be found within the North Norfolk Design Guide.

Policy ENV 10

Protection of Amenity

~~For a~~ All new development, ~~consideration will provide for a high standard of need to be given to~~ general amenity impact issues, especially including adequate living and working conditions. This standard should be achieved and maintained without preventing or unreasonably restricting the continued operation of established authorised uses and activities on adjacent sites.

Development will not be permitted which causes unacceptable ~~effects~~ impacts on the residential amenity of neighbouring occupants, or does not provide for adequate levels of amenity for future occupants.

In assessing the impact of development on the living and working conditions of existing or future occupants, ~~regard~~ proposals will be had to in conformity with the North Norfolk Design Guide (or any successive document) or provide a justification for any departure from this and will have regard to the following considerations:

- ~~1. The provision of adequate areas of useable and secluded private amenity space for the occupiers of proposed dwellings, in keeping with the character of the immediate surrounding area;~~
- ~~2. the protection of adequate areas of useable and secluded private amenity space for the occupiers of existing dwellings, in keeping with the character of the immediate surrounding area;~~
2. ~~3.~~ Loss of privacy and outlook and prevention of overlooking of windows of habitable rooms and private amenity space;
- ~~4. overbearing impact/visual dominance;~~
- ~~5. of overshadowing of private amenity space;~~
3. ~~6.~~ loss of daylight and/or sunlight and prevention of overshadowing to existing windows of habitable rooms;
4. ~~7.~~ prevention of disturbance from odour, noise, vibration, dust, air and artificial light pollution. or other forms of nuisance such as artificial light pollution, insects and vermin; and
- ~~8. other forms of pollution (including, but not limited to: contaminated land, dust, air and light pollution).~~

ENV 11 Protecting and Enhancing the Historic Environment,

The purpose of this policy is to conserve and where possible enhance the historic environment.

Appendix 2 Emerging Policies Discussion Draft PPBHP

The Local Plan aims to ensure that North Norfolk's ~~built heritage~~ historic environment is conserved or, wherever possible enhanced and that new development is of high quality design. Paragraph 185 of the NPPF states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”. The NPPF also states that Local Plans should include strategic policies to “make sufficient provision for ...conservation and enhancement of the ...historic environment” (Paragraph 20). The quality of the built environment and the presence of historic assets make a valuable contribution to the appeal of North Norfolk.

There are 81 Conservation Areas, 2265 Listed Buildings, including 94 Grade I and 202 Grade II*, 86 Scheduled Monuments and 33 Historic Parks and Gardens within the District. There are also ~~190 more than~~ 250 buildings on the Council’s Local List. These are buildings that do not fully meet the criteria for being nationally listed, but are considered of architectural or historical importance for the local area, **meeting Historic England’s criteria for Local Listing as set out in Historic England’s Advice Note 7: Local Heritage Listing**¹³.

New Para: Local Listing does not introduce any additional powers of control, instead it acts as a means of identification and plays an important role in the assessment of development proposals. The effect of an application on the significance of a non-designated heritage asset is a material consideration when deciding planning applications, and Local Listing strengthens the case for retention of a historic building. The number of non-designated heritage assets on the list is likely to increase over time as new buildings and other assets are identified. The requirements of the policy equally apply to any local heritage assets identified and listed in adopted Neighbourhood Plans.

Planning Practice Guidance (PPG) states “any decisions relating to Listed Buildings and their settings and Conservation Areas must address the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 (see in particular sections 16, 66 and 72) as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan”. The PPG sets out the detailed considerations that must be followed in these applications.

New Para: All development proposals should, in the first instance, avoid harm to any heritage asset. Only where harm cannot be avoided will mitigation then be considered. Key distinctions are drawn in the NPPF¹⁴ between designated and non-designated heritage assets in respect of the level of protection provided and between harm which is 'substantial' and 'less than substantial'. This affects the level of planning benefit which a proposal will need to demonstrate in order to be supported. The threshold for justifying substantial harm to a heritage asset is higher than the threshold for justifying less than substantial harm.

All development proposals that would affect the significance of a designated or non-designated heritage asset and / or its setting, or any known, or possible, archaeological sites, will be required to provide, in the form of a heritage statement, sufficient information proportionate to the importance of the asset and the impact of the proposed development, to enable any impact to be accurately assessed.

The Council has prepared a number of Conservation Area Appraisals and Management Plans (CAAs) which look at the boundaries, general conditions, identity and character of individual Conservation Area designations. Negative features that detract from the special qualities of an area are also identified and management recommendations for protection and enhancement of the area are proposed. The Council is establishing a programme for the

¹³ <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag018-local-heritage-listing/>

¹⁴ Chapter 16. Conserving and enhancing the historic environment, NPPF 2018.

next round of CAAs. The policy requires that proposals within Conservation Areas should be determined in accordance with any relevant CAAs which are a material planning consideration. High quality maintenance and repair of historic assets will also be encouraged. Where necessary, the Council will employ measures to maintain and enhance the quality of Conservation Areas such as Urgent Works and Repairs Notices, Section 215 Notices and Article 4 Directions.

Development proposals should identify assets of archaeological significance. A heritage statement will be required for development sites that are known or thought to have the potential to include non-designated heritage assets with archaeological interest. Where appropriate, preference will be given to preservation of archaeological remains in situ unless it can be shown that the recording of remains, assessment, analysis, report, publication and deposition of archive is more appropriate. It is important to note that, as a result of lack of information or awareness, many heritage assets remain undiscovered or without official recognition. The existence of an asset may become apparent as a result of a planning application, at which time the Council may deem that it is appropriate to apply this policy.

New Para: Historic England hold a Heritage at Risk Register¹⁵ which currently contains 19 entries in North Norfolk. Support will be given to proposals that bring into use or improve an asset so it is no longer deemed at risk on the Heritage at Risk Register.

The conservation of heritage assets does not prevent all change but requires it to be managed in a way which does not compromise heritage significance and which exploits opportunities for enhancement.

Policy ENV 11: Protecting and Enhancing the Historic Environment

The Council will protect, conserve and, where possible, enhance heritage assets ~~throughout the District~~ through the special protection afforded to Listed Buildings, Conservation Areas, **Registered Parks and Gardens** and Scheduled Monuments and through careful control of development that might adversely affect non-scheduled, nationally important archaeological remains; other areas of archaeological potential or importance; historic features and their settings; non-designated heritage assets; and areas of historic landscape or parkland (including, but not limited to, those on the Historic England Register of Parks and Gardens of Special Historic Interest).

The Council will protect, conserve and, where possible, enhance the North Norfolk historic environment by:

- (a) conserving the historic dimension of the landscape;
- (b) conserving cultural, built, historic and archaeological features of national and local importance and their settings, including those that are not formally designated;
- (c) identifying and protecting locally important buildings that contribute to the area's local character and identity; and
- (d) increasing opportunities for access, education and appreciation of all aspects of the historic environment, for all sections of the community.

In all cases there will be an expectation that any new development will enhance the historic environment or better reveal the significance of the heritage asset, in the first instance, unless there are no identifiable opportunities available. In instances where existing features have a negative impact on the historic environment, as identified through

¹⁵ <https://historicengland.org.uk/advice/heritage-at-risk/>

character appraisals, the Council will, as part of any development proposal, seek the removal of the features that undermine the historic environment. The re-use of Listed Buildings and buildings identified on the Local List will be encouraged and the optimum viable use that is compatible with the fabric, interior and setting of the building will be permitted.

Designated Heritage Assets

Development proposals, including alterations and extensions, should, conserve or where opportunities arise, enhance a designated heritage asset including any contribution to that significance by its setting. Harm should be avoided in the first instance. Any harm requires clear and convincing justification.

Development proposals, including alterations and extensions, that result in substantial harm to or total loss of significance of a designated heritage asset ~~and/or~~ including any contribution to that significance by its setting will only be permitted in exceptional circumstances (Grade II) or wholly exceptional (Grade II* and Grade I and Scheduled Monuments) where it is demonstrated that the harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss. Where a development proposal will lead to less than substantial harm this harm should be weighed against the public benefits of the proposal.

Non-designated Heritage Assets

Development proposals, including alterations and extensions, should, conserve or where opportunities arise, enhance a non-designated heritage asset including any contribution to that significance by its setting.

Development proposals, including alterations and extensions, that result in substantial harm to or total loss of significance of a non-designated heritage asset including any contribution to that significance by its setting will be required to provide sufficient information to demonstrate that any harm has been fully assessed. The Local Planning Authority will make a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset.

Conservation Areas

The character and appearance of Conservation Areas will be conserved, and where possible opportunities arise enhanced. ~~and,~~

In consultation with all relevant stakeholders, a further programme of conservation area appraisals and management plans will be undertaken and used in the determination of development proposals.

Archaeology

Development proposals should identify assets of archaeological significance. An archaeological evaluation will be required for development sites that are known or thought to have the potential to include non-designated heritage assets with archaeological interest. Where appropriate, archaeological remains should be left in situ following further design/engineering work. If the benefits of a particular development are considered to outweigh the importance of retaining archaeological remains in situ, satisfactory excavation and recording of remains will be required before development is begun.

Heritage Statement

Development proposals that would affect the significance of a designated or non-designated heritage asset including any contribution to that significance by its setting ~~and/~~

~~or its setting, or any known or possible archaeological sites,~~ will be required to provide, in the form of a heritage statement, sufficient information proportionate to the importance of the asset and the impact of the proposed development, to enable any impact to be accurately assessed.

Heritage at Risk

Development proposals that bring into use or improve an asset so it is no longer deemed at risk on the Heritage at Risk Register will be supported where appropriate to their significance.

End

This page is intentionally left blank

LOCAL PLAN – PROGRESS UPDATE ON SITE SELECTION OPTIONS - DEFERRED SITES

Summary: This report provides an update on sites which were previously considered for allocation and which were deferred for a variety of reasons.

- Recommendations:
- 1 **That the following sites be retained as allocations in the proposed Submission Local Plan:**
 - **Mundesley MUN03/A - Land off Cromer Road & Church Lane**
 - **Blakeney BLA04/A Land East of Langham Road**
 - 2 **The final policy wording is delegated to the Planning Policy Manager**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Mark Ashwell, Planning Policy Manager, 01263 516325, mark.ashwell@north-norfolk.gov.uk</p>	

1. Introduction

- 1.1 At previous meetings of the Working Party the Planning Policy Manager presented reports and site assessment booklets relating to proposed allocations for Holt, Mundesley, and Blakeney. He outlined the main issues relating to each settlement and recommended sites for inclusion in the Local Plan, ahead of Regulation 19 consultation and subsequent submission to the Secretary of State for examination. In a small number of cases the Working Party resolved to defer consideration, and in the case of site selection at Blakeney Cabinet has requested that the Working Party reconsider its previous decision.
- 1.2 The purpose of this report is to revisit these sites and to update members on the latest position.

2. Holt - Site H04 – Land South of Beresford Road

- 2.1 At the meeting of the Working Party held on 15 June 2020 the report identified suitable, available and deliverable sites in order to meet the identified need in Holt including for housing, a new primary school and additional employment land. All proposed sites were agreed with the exception of site H04 at Beresford Road due to a number of concerns including the suitability of site access arrangements and the likelihood, or otherwise, of school delivery. As members will be aware this site is also subject to a planning application for housing and a new primary school (the Gladman proposal) which has been refused planning permission and is subject to an appeal. A public Inquiry has been held but currently there is no indication as to when a decision might be reached.

- 2.2 Pending a decision on the appeal officers have not commenced work on alternative options given that the outcome of the appeal will largely determine if there is a need to consider alternative sites. It is hoped that the position will become clearer early in the new year to allow for this issue to be reconsidered by the Working Party.

3. Mundesley - Land off Cromer Road & Church Lane (MUN03/A)

3.1 At the meeting of the Working Party held on the 1 June 2020 site MUN03/A Land off Cromer Road & Church Lane was identified and recommended for inclusion in the Local Plan for residential development.

3.2 Members expressed concern that the possibility of development on site MUN03 had already been discounted twice on landscape grounds when the previous local plan was being prepared. It was felt that the development of 50 homes would block the view of local heritage landmarks, including the church, be visible for miles around and have a severe impact on the Victorian terraced properties at the bottom of the hill. Furthermore, the Parish Council had a scheme for 16 affordable dwellings on an alternative site that it wished to discuss. Members of the Working Party unanimously took the decision to defer the allocation of this site to allow for further discussions with the Parish Council.

3.3 A meeting was held with Mundesley Parish Council (MPC) on the 7 July 2020. MPC presented their desire to bring forward site MUN11 as an alternative for development to include affordable housing and self-build units. They indicated that such a scheme could provide allotments and new open space areas which would serve local needs more than the existing open land area.

3.4 Officers explained that MUN11 had scored negatively in the Site Appraisal process due to the loss of a designated open space land, and the potential loss of biodiversity. Officers also raised concerns over the deliverability of bringing this site forward especially if in line with the PC's ambition it was solely for affordable housing and self-build units. It was suggested that that there had been a misinterpretation around the existing policy context of the site. It was explained that in order to develop the site it did not require allocation – the site is already located within the development boundary of the village and therefore if the loss of open space issue could be addressed existing policies would allow for delivery of affordable homes in accordance with the Parish Councils' ambition. Such a proposal would comply with, and compliment, Mundesley's position in the proposed settlement hierarchy but would not negate the need to allocate land in the plan for housing growth.

3.5 It was suggested that MPC should progress site MUN11 outside of the Local Plan process, confirming that the emerging policy context also would not stop the PC as the landowner from bringing forward the site for market or affordable housing in line with its ambitions if they were able to address the loss of open space issue. Housing colleagues have subsequently contacted the PC and reaffirmed their willingness to support the PC in developing the site and finding a potential registered provider should they wish to progress.

- 3.9 During the meeting it was confirmed that MPC have no objection to the principle of some development on site MUN03/A or the view that a reduced number of 30 dwellings, rather than the 50 previously proposed, positioned on the lower section of the site was more appropriate. Given the prominence of the elevated section of the

site and the perception that higher density development could impact on surrounding views as well as heritage considerations it was thought that the housing requirement could be reduced.

3.10 Historic England do not object to the proposal on heritage impact grounds provided the policy contains the following criteria:

- Development should conserve and where appropriate enhance the Mundesley Conservation Area and grade II listed All Saints Church.

3.11 The subsequent Historic Impact Assessment undertaken by officers concurs with the advice given by Historic England. The above criterion has been included in the amended Policy, and the allocation reduced to 30 residential units in order to respect the visual importance of the landscape and the character of the historic environment. On this basis, the allocation of MUN03A for approximately 30 dwellings is recommended.

4. **Blakeney**

4.1 At the 13 July 2020 meeting of the Working Party it was recommended that members endorse site BLA04/A for inclusion in the Local Plan. Members resolved to endorse an alternative site BLA01/A. This decision resulted in local objections and when presented to Cabinet for ratification Cabinet resolved that the matter should be considered again by the Working Party.

4.2 In light of the debate at the Working Party both promoters of the alternative options were asked to provide further information in relation to what could be delivered on each site and its impacts. Both have now provided:

- Viability Assessments – these are based on assumptions about how the sites might be developed for a mixed housing scheme of approximately 30 dwellings. Both conclude that development would be viable and could deliver 35% affordable homes in accordance with policy requirements.
- Indicative layout drawings. These show 'potential' developments, they are not formal proposals and the Council is not being asked to reach a view on the acceptability or otherwise of these specific schemes. They should be regarded at this stage as illustrative feasibility plans.
- Landscape Impact Assessments.

4.3 These documents have been circulated to Members of the Working Party and parish council. In addition to submissions made by the site promoters there have been representations by local residents (also circulated to Members). This information will be presented in further detail at the meeting.

4.4 All potential allocations have been subject to a standardised assessment process which is designed to assess the overall sustainability of proposals. It requires consideration of a range of criteria which consider such matters as proximity to day to day services, technical matters such as access, degree of constraints such as flood risk, and the impacts of development in relation to issues such as wildlife and landscape impacts. The process does **not** select the sites for allocation, it provides a systematic process for comparing sites, but the final selection still requires the exercise of planning judgement and the weighing of considerations. For example, it may be that a particular proposal is assessed as having an adverse landscape impact but that the benefits of the proposal outweigh those impacts.

4.4 Sites BLA/01A and 04A perform in similar ways in the assessment process (Extract below). Both are edge of settlement locations, involve development of greenfield land, are located similar distances from key services, and both are technically capable of being developed. However the assessment concluded that BLA04/A had a lesser impact on landscape character and it was mainly this factor which led to it being recommended at the previous meeting.

4.5 The details now submitted by the promoters of BLA/01A (Oddfellows) show fewer dwellings (30 instead of the 91 previously appraised), confirmation that access could be provided to Langham Road, and the inclusion of an area of public open space. This revised proposal has been re-appraised and given a new reference BLA01/B. It remains the case that with the exception of landscape impacts, where BLA04 is judged to be less harmful, the schemes are comparable across the assessment criteria.

4.6 The landscape character around Blakeney is one which is largely determined by its coastal location and views towards the sea over the marshes are critical to the landscape character and setting of the village. Blakeney Church is also a well-known local landmark and is a prominent feature from many vantage points. Both sites will have a landscape impact but Officers remain of the opinion that site BLA04A represents the less harmful of the potential options. Development on BLA04A is considered to be well related to the built up area of the village, it does not represent a significant incursion into the countryside and will mirror the recent development that has already taken place on the opposite side of Langham Road. Important views of the Church will remain.

5. Recommendations

1. That the Working Party recommend to Cabinet that the following sites be retained as allocations in the proposed Submission Local Plan:

- **Mundesley MUN03/A - Land off Cromer Road & Church Lane (reduced to approx. 30 dwellings)**
- **Blakeney BLA04/A Land East of Langham Road**

2. The final policy wording is delegated to the Planning Policy Manager.

6. Legal Implications and Risks

6.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy and proposals each must be justified and underpinned by evidence, the application of a consistent methodology and demonstrate how public feedback has informed the Plan.

It is essential that site allocations can be justified and are supported by a clear audit trail showing how sustainability objectives have been taken into account. Assessment must:

- Take account of national planning principles;
- Be transparent;
- Enable a consistent basis for comparison between sites;
- Enable unsustainable sites to be filtered out and development to contribute to the delivery of sustainable growth.

- 6.2 If the above process is not followed, then there is a risk of sites being found to be unsound and unjustified at examination, which would require more work and could result in further delays to the local plan adoption process.
- 6.3 The statutory process requires records of consultation feedback and demonstration of how this has/will have informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22 and also requires that a sustainability appraisal has informed the production of the Plan.

7 **Financial Implications and Risks**

- 7.1 Failure to undertake plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

This page is intentionally left blank

Appendix 1 – Updated Site Assessment for Blakeney site options

Site Ref	Site Name	Site Size (ha)	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Uses
BLA01/A	Land South of Morston	3.05	91	Green	Amber	Green	Amber	Green	Green	Red	Amber	Amber	Green	Green	Green
BLA01/B	Land South of Morston Road	3.14	30	Green	Amber	Green	Amber	Green	Green	Red	Amber	Amber	Green	Green	Green
BLA04/A	Land East of	1.50	30	Green	Amber	Green	Amber	Green	Green	Amber	Amber	Amber	Green	Green	Green

Colours equate to a traffic light system with green being positive, amber neutral, and red negative.

This page is intentionally left blank

LOCAL PLAN SITE ALLOCATIONS: North Walsham

Summary: To identify the final suite of allocations for North Walsham ahead of Regulation 19 Consultation and subsequent submission.

- Recommendations:
1. **It is recommended that Members endorse the identified sites for inclusion in the Local Plan.**
 2. **The final policy wording is delegated to the Planning Policy Manager.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officers, telephone number and email:</p> <p>Mark Ashwell, Planning Policy Manager, 01263 516325, mark.ashwell@north-norfolk.gov.uk</p> <p>Stuart Harrison, Senior Planning officer 01263 516308, stuart.harrison@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 At Regulation 18 stage the Council identified a large number of candidate development sites which had been suggested for different types of development. From those available a number of Preferred Options were identified and all sites put forward were then subject to consultation. In the current stage of plan preparation, the task is to consider the comments made and decide which sites should progress to the next stage. Where preferred sites are discounted it will be necessary to identify alternatives (from those available) to ensure that identified needs and the objectives of the Plan are addressed. The remaining sites will then need to be subject to Habitat Regulation Assessment, Heritage Impact Assessment as appropriate and in some cases specific further evidence in relation to deliverability will be required.

- 1.3 This report focusses on the identification of suitable, available and deliverable sites in order to meet the identified housing requirement in North Walsham and recommends preferred sites for inclusion in the Draft Plan. It provides the updated assessment of each of the sites considered and presents Officers conclusions on the availability and suitability of each site drawing together the Sustainability Appraisal, the Site Assessment and the Regulation 18 consultation responses. It also details the proposed policies which will be applied when planning applications are submitted.
- 1.4 **The purpose** of this report is to ratify a final suite of sites in North Walsham ahead of consultation (Regulation 19) and then the submission of the Plan. Where recommended sites are discounted by Members it is necessary to consider which alternative options should be identified as preferred options to ensure strategic objectives around housing provision and other land uses are addressed. Failure to do so runs the risk that the Plan will be found unsound at examination as it will fail the test of being positively prepared to address identified needs.

2. Background and Update

- 2.1 The settlement hierarchy sets out where new development in North Norfolk will take place. The majority of which is in identified towns and a small number of larger villages, dependent on their local housing and other development needs, their role as employment, retail and service centers, and identified environmental and infrastructure constraints. Such locations are also inextricably linked to climate change and how, through the Plan, the Council can incorporate measures that mitigate and adapt to its effects, principally by reducing the need to travel.
- 2.2 The allocations seek to address the objectively assessed strategic need across the District and aim to boost the supply of identified deliverable sites that will support growth in the Plan period. Plans must include and demonstrate how future need for homes (and other uses) will be provided and clearly set out how the Plan will deliver the Objectively Assessed Needs (OAN). The distribution of growth and overall housing numbers are set out in policies SD3 and HOU1 at Regulation 18 stage.
- 2.3 Specific housing targets and allocations are provided for in the Large Growth Towns, Small Growth Towns and the four identified Growth Villages in Policy HOU1, which reflects their role and function. Sites have been identified that are well related to these settlements in order to meet the proposed targets. The process though is iterative and as the Plan moves towards Regulation 19 there is a process of continuous evaluation.

3. Site Selection Methodology

- 3.1 It is important to note that the site selection process follows a clear, transparent and justified assessment process which itself was subject to consultation and follows government advice, and this allows for a consistent approach across the District. Policies and proposals that are justified and evidenced in a positive and realistic way, will provide more certainty at examination and stand the test of time. Building a strong evidence base to support and inform not just site selection but policies throughout the Local Plan is vital to its immediate and long-term success.
- 3.2 Evidence can be both quantitative (facts and figures such as census data) as well as qualitative, (e.g. opinions given in consultation responses, as long as they are backed up by facts). Evidence, **not opinion**, should be used to inform decisions on policies and proposals. Such evidence should also be made publically available in a full and transparent way throughout the production of a Plan where it will be

scrutinised at future consultations, submission and examination. It is worth remembering that **planning policies and site proposals need to be based on a clear planning rational and aligned to the legislative requirements.**

- 3.3 The site assessment methodology follows the process advocated in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance. The detailed methodology was explained in Background paper no 6, [Development Site Selection Methodology](#) which accompanied the previous Regulation 18 consultation and can be found in the published document library under consultation documents. **The process is summarised in the report appended to this report as Appendix 1 and along with the Background paper should be read in conjunction with this report.** The continued application of a consistent methodology through assessment and decision making is paramount to Plan making and the legal tests of soundness which the Plan is examined against.

4. Site Selection

- 4.1 In order to provide an audit trail and a concise location for the review of information, updated assessments of each of the sites considered have been undertaken and are included in the Site Assessment Booklet appended to this report. This booklet details background information including contextual settlement level information, includes a summary of the feedback from Regulation 18 consultation from statutory consultees, individual members of the public and from parish councils. It includes a review of issues and constraints and goes on to detail officers detailed assessment through an updated set of assessment criteria and Red, Amber, Green (RAG) scoring system. There is an updated Regulation 19 Sustainability Appraisal and the detailing of the review of each site option put forward.
- 4.2 The assessments conclude with the reasoned justification and recommendation for the selection, or information on why sites were discounted, which is summarised in Section 6, below. They will be updated and further informed with factual information such as the emerging Employment Study and Open Space Study and the results of Habitat and Heritage Impact Assessments where required. A number of statutory consultees made standardised comments in relation to many of the proposed allocations seeking clarity and consistency in the wording of the applicable policies including Anglian Water, Minerals and Waste Authority, Environment Agency and Natural England. All of these requested changes will be incorporated into the final Plan.
- 4.3 In some cases site promoters have started to respond to the representations which were made and have either amended their proposals or submitted additional information. Where this is the case it is referenced in the booklet.
- 4.4 For both the proposed mixed use allocations in North Walsham it is recommended in the Policy that a Development Brief is produced. For the Western Extension, work is underway on the development brief and will provide further information and detail on many of the matters discussed above.

5 Update information for North Walsham

- 5.1 **Transport Evidence Study 2020:** The study provides a high-level traffic assessment of the growth allocated in the emerging Local Plan of NNDC in North Walsham.

- 5.2 The report concludes that the delivery of a Western Link Road (WLR) is expected to mitigate a number of the traffic impacts that the growth proposed in North Walsham could cause. This high-level study also identifies that the possible WLR extensions should improve the benefits of the WLR and that it is feasible (in engineering terms) to deliver the WLR with possible northern and southern extensions. Additionally, the WLR is expected to solve some of the existing routing issues for HGVs caused by the low bridges in the town with the delivery of the northern spur.
- 5.3 **Development Brief Engagement:** Initial engagement and discussions have been had with Local Stakeholders including North Walsham Town Council and Regenerate North Walsham to provide them with an update on the production of the Western Extension Development Brief. Further engagement and consultation is scheduled to take place in the New Year. We are continuing to liaise with colleagues through-out the Council (and partners) on the other projects in the Town – such as the High Street Heritage Action Zone project team.
- 5.4 We are continuing to ensure that landowners, site promoters and other partners are keep informed of progress.

6 Summary of Site Assessment for North Walsham

- 6.1 North Walsham does not have the significant environmental and landscape constraints that are found elsewhere in the District. It is not in the AONB, close to the Broads or in proximity to any international designated sites. Whilst over the Plan period it is expected that a process of re-development, infill developments, and changes of use will continue to provide a supply of new homes and other uses, these opportunities are relatively modest and will not address the identified need for new homes in particular. New greenfield allocations are therefore necessary in order to deliver the required growth. The scale of growth envisaged in North Walsham will allow for the delivery of infrastructure that is of local strategic importance, namely, the delivery of highway improvements and significant areas of open space and green infrastructure.
- 6.2 There were over 50 sites to consider in North Walsham, which were predominately greenfield sites around the edge of the town. Discounted sites were not chosen for a number of reasons including the impact development could have on the landscape and countryside more generally. Those sites with adverse junction and cumulative highway network impacts and those where suitable vehicular access isn't achievable were also ruled out. Some sites were not well connected to key services and the town centre by walking, cycling or public transport were considered unsuitable. Site selection has also sought to avoiding sites which are detached from the town and not well related to the existing built up areas.
- 6.3 The delivery of a larger number of smaller sites around the town may deliver the appropriate level of housing required, however, there are concerns that such a strategy would not deliver the strategic infrastructure benefits for the town, namely improved transport infrastructure, enhanced green infrastructure & open space and other community infrastructure such as a new primary school.
- 6.4 Two sites for mixed use allocation have been identified as the preferred options for North Walsham with an allocation of approximately 2150 new dwellings. Another site has been identified for allocation as employment land providing a further 2ha of land adjacent to the existing industrial estate. It will provide land for a new strategic road link from the western link road that will provide access into the industrial estate and onto the wider network.

- 6.5 These 3 sites are considered to be the most suitable sites available for North Walsham and subject to the detailed policy requirements these sites are considered to be the most appropriate options to meet the housing and employment land requirement. Each are well located to services within the town centre, existing employment land and to the local schools (both existing and proposed), they are reasonably contained within the landscape and will deliver the strategic infrastructure required.
- 6.6 None of the selected sites are subject to insurmountable constraints and the consultation process has shown that they are deliverable over the Plan period provided that development proposals come forward which comply with the suggested policies of the Plan (as modified following the consultation).
- 6.7 The following sites have been chosen as preferred sites, and meet the requirements for North Walsham:
- NW62 - North Walsham Sustainable Western Extension:** is a sustainable urban extension to the west of the town and will provide up to 1800 new houses, 7 hectares of employment land and a site for a new primary school. The Western Extension will deliver a new western link road which will mitigate the impact of the development traffic and improve general transport network conditions in the town. It will deliver significant amount of public open space and new green infrastructure.
- NW01/B** - Land at Norwich Road & Nursery Drive will have an allocation of up to 350 dwellings, 2 hectares of employment land and will improve connectivity between previously developed residential sites. It will deliver 3.5ha public open space.
- NW52** - Land East of Bradfield Road will provide approximately 2.4ha of employment land plus land for a new highway connection (and highway improvements) between Cornish Way and Bradfield Road.
- 6.8 The detailed Site Assessment Booklet should be read in conjunction with this report and is included in **Appendix 2**.

7. Recommendations

- 1. It is recommended that members endorse the identified sites for inclusion in the Local Plan.**
- 2. The final policy wording is delegated to the Planning Policy Manager.**
- 3. That all other sites are discounted at this stage.**
- 4. That the green open space designations shown on the site assessment maps are agreed.**

List of proposed allocations

Residential Sites

Site Ref	Description	Gross Area (ha)	Indicative Dwellings
NW01/B	Land at Norwich Road & Nursery Drive	18.62	350
NW62/A	North Walsham Western Extension	108.3	1800

Employment Site

Site Ref	Description	Gross Area (ha)
NW52	Land East of Bradfield Road	2.4ha

8 Legal Implications and Risks

- 8.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy and proposals each must be justified and underpinned by evidence, the application of a consistent methodology and demonstrate how public feedback has informed the Plan.
- 8.2 The statutory process requires records of consultation feedback and demonstration of how this has/will have informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22 and also requires that a sustainability appraisal has informed the production of the Plan

9. Financial Implications and Risks

- 9.1 Failure to undertake plan preparation in accordance with the regulations and NPPF is likely to render the plan 'unsound' at examination and result in the need to return to earlier stages. Substantial additional costs would be incurred.

Appendix 1 – Site Assessment Methodology

Appendix 2 –Site Assessment Booklet North Walsham

Local Plan: Approach to Site Assessment

Summary: The purpose of this report is to outline the methodology and decision making framework for the finalisation of site selection in the Local Plan.

Recommendations: The report is for information and advice only.

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer;	
Iain Withington Planning Policy team leader / Acting Policy Manager 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 This report focusses on the site selection methodology used, outlining the approach taken to date and explains how selection has utilised public feedback and further statutory comments in order to identify a final suit of sites for the emerging Draft Plan over the coming months. Although the site selection methodology has been reported to previous working parties and subsequently consulted on, membership of the working party has fluctuated not least following the local elections held last year. Ahead of future work it is considered prudent to update members of the process undertaken to date and the further work that

has been undertaken since the consultation that is incorporated into such assessments.

- 1.3 **The purpose** of this report is to bring to the attention of Members the process and framework that is being used in the identification of suitable sites and forms the basis for decision making. The report is written in unusual times during the suspension of normal council committees due to Covid19. Alternative arrangements have been put in place that continue to allow Cabinet to endorse recommendations made through the portfolio holder for planning following discussion with officers. This report forms the basis of those discussions and is intended to aid decision making and help with maintaining transparency and an audit trail.
- 1.4 The approach is one that is thorough, proportionate and one that is based on evidence, utilises consultation feedback and objective inputs from the statutory bodies. Site selection can be emotive but it remains that selection and examination needs to be based wholly on evidence. Policies and proposals that are justified and evidenced in a positive and realistic way, provide more certainty at examination and stand the test of time. Building a strong evidence base to support and inform not just site selection but policies throughout the Local Plan is vital to its immediate and long-term success.
- 1.5 Evidence can be both quantitative (facts and figures such as census data) as well as qualitative, (e.g. opinions given in consultation responses, as long as they are backed up by facts). Evidence, **not opinion**, should be used to inform decisions on policies and proposals. Such evidence should also be made publically available in a full and transparent way throughout the production of a Plan where it will be scrutinised at future consultations, submission and examination. It is worth remembering that **planning policies and site proposals need to be based on a clear planning rational and a proper understanding of the legislative requirements.**

2. Site Selection Methodology

- 2.1 The site assessment methodology follows the process advocated in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance. The detailed methodology was explained in Background paper no 6, [Development Site Selection Methodology](#) which accompanied the previous Regulation 18 consultation and can be found in the published document library under consultation documents. The paper should be read in conjunction with this report.
- 2.2 The process can be summarised as follows:
- **Stage 1: Screening out sites that do not meet given selection criteria** - This excludes sites from further consideration which are outside the selected settlements, subject to absolute constraints such

as those being within a non-selected settlement, coastal erosions zone or within flood risk zone 3. This stage also removes sites that are not capable of delivering 5 or more dwellings, or are less than 0.25 hectares (or 500m² of commercial floor space) as the Council are unlikely to allocate such small sites for development.

- **Stage 2a: Applying Sustainability Appraisal (SA) process:** This measures each site against measurable site assessment criteria based on the SA Objectives and SA Framework
- **Stage 2b: Considering further site suitability criteria:** Sites are assessed against further suitability criteria considering the wider issues, policy context and evidence. The assessments are informed by engagement with relevant consultees such as the Highway Authority and Anglian Water.
- **Stage 2c: Considering Availability and Deliverability:** Sites are assessed against further availability and deliverability criteria considering whether suitable sites can actually be delivered during the plan period.

2.3 Sustainability Appraisal

2.4 Sustainability Appraisal (SA) is a tool that is used to inform decision making by identifying at an early stage and iteratively throughout the process the potential social, economic and environmental impacts of proposed allocations, plans and strategies. This allows the potential environmental, economic and social impacts of the proposals to be systematically taken into account, and should play a key role throughout the plan-making process. It provides a tool for assessing the relative merits of alternative options to help inform decisions. The SA uses a detailed assessment framework that assesses sites as having likely positive or adverse Impacts against the identified SA indices.

2.5 A RAG rating system identifies those sites with most dark green (++) contributing significantly towards the Sustainability Objectives and considered the most suitable, and those sites pink (--) which are considered to contribute least. An element of planning judgement is required to assess the sites in terms of their sustainability. Different weight may be given to each of the indices reflecting the characteristics of the sites being assessed. The SA is a statutory document in its own right. The interim report was consulted on at Regulation 18 stage and the final SA will form part of the considerations in finalising the Draft Plan and will be published at the next stage of Plan making.

Table 1: Sustainability Appraisal framework

Indicator	Effect
++	Likely strong positive effect
+	Likely positive effect
0	Neutral/no effect
~	Mixed effects
-	Likely adverse effect
--	Likely strong adverse effect
?	Uncertain effect

2.6 At regulation 18 stage sites were assessed against a detailed set of criteria including an assessment of the impact on utilities, highways issues, flooding and a range of other considerations as detailed in table 2 below. Using a RAG scoring system, the site appraisal framework identified those sites which are considered most suitable for development, and furthermore, those sites which can be delivered in the plan period. The assessments were reported to earlier PPBHWP's and underwent consultation as detailed in paragraph 1.1

Table 2: Site Assessment framework

Access to Site	Transport and Roads	Sustainable Transport	Impact on utilities infrastructure	Utilities Capacity
Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity
Historic Environment	Loss of other beneficial use	Compatibility with Neighbouring / Adjoining Uses	Other known constraints	Deliverability

2.7 Selected sites are subject to allocations policies which detail what the Council would expect to be delivered when the site is developed. Where there are specific development considerations arising from the findings of the site assessment or evidence base studies, these are included within the text of the policy. Initial policy wording/requirements for the preferred sites at regulation 18 stage were based on our understanding of key issues that have emerged through technical assessment at that time.

2.8 The site policy also identifies an approximate range for the proposed number of dwellings on the site. The final allocated number of dwellings will be informed by further information, evidence such as emerging open space requirements and requirements of onsite infrastructure along with the considerations of the remaining local plan policies.

2.9 Following the Regulation 18 consultation the SA has been reviewed and each site assessment has been updated in order to consider the feedback received, take account of more detailed technical considerations received and any further updated and or relevant evidence.

2.10 In particular officers are undertaking a more detailed Historic Impact assessment in line with feedback given from Historic England. Further site access comments and technical considerations have been received from County Highways. Further technical studies have been received, some site promoters others from statutory bodies such as the Network Improvement Strategies recently finalised by Norfolk County Council. Infrastructure requirements have been reviewed with statutory providers such as the Education Authority and United Utilities. The sites have been

subjected to an interim Habitat Regulation Assessment, HRA. Feedback contained in the Interim Habitat Regulations Assessment has also informed site selection.

- 2.11 In line with regulations the Draft Plan will also be informed by a final HRA
- 2.12 A number of new and alternative sites were put forward at the time of the regulation consultation. These have also been reviewed in line with the settlement hierarchy, site thresholds and assessed and where appropriate an SA has been undertaken.
- 2.13 The findings of the site assessments have been consolidated into individual settlement site assessment booklets. These will accompany future settlement based reports and be published as part of the Draft plan evidence.

3 Conclusion / Recommendations

- 3.1 This report is for information and advice only

4 Legal Implications and Risks

- 4.1 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 evidence, the application of a consistent methodology through assessment and decision making is paramount.
- 4.2 The statutory process requires records of consultation feedback and 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. Such a commentary will be included in the Consultation Statement.

5 Financial Implications and Risks

- 5.1 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.

End

This page is intentionally left blank

North Norfolk District Council

Site Assessment (Regulation 19): North Walsham

Draft for Planning Policy & Built Heritage Working Party

21.04.20 update date when finalised

Contents

Part 1: Settlement Information	1
1.1. Introduction	1
1.2. Sites Promoted & Considered (Regulation 18)	2
1.3. Background Information	7
1.4. Constraints	13
1.5. Habitat Regulations Assessment / Appropriate Assessment	15
1.6. Statutory Consultee Responses (Regulation 18)	16
1.7. Summary Consultation Comments (Regulation 18) June 2019	21
Part 2: Assessment of Sites	26
2.1. RAG Assessment Matrix	26
2.2. Sustainability Appraisal Conclusions (Regulation 19)	32
2.3. Planning History	48
2.4. Site Assessment	49
Part 3: Overall Site/Settlement Conclusions	70
3.1. Proposed Site Allocations: Reasoned Justification	70
3.2. List of Site Allocations	71
3.3. Policy Wording (Regulation 19)	71
3.4. Open Space Designations	74
Appendix 1: Preferred Sites	81
Appendix 2: Alternative Sites	82
Appendix 3: Open Space Designations	83

Document Control

Date	Officer	Content Added	Actions / Remaining Tasks
19/03/20	CB	Reg 18 & cumulative highway comments	N/A
19/03/20	CB	Summary Consultation Comments Regulation	N/A
08/04/20	JM	Updated Open Space, PPS and Education. Education, Infrastructure and Employment awaiting updates	Complete – subject to updates to studies/ background papers
21/04/20	CB	<ul style="list-style-type: none"> - Part 1 / Part 2 of booklet made clearer - Cover added - References to original sources of information removed throughout. - Open Space table updated to included LGS refs, removed ref to 'provisional recommendation', and changed title from 'Open Space – AGS Study' to 'Open Space'. - Action column deleted from Reg 18 Summary of Comments 	N/A
10/05/20	CB	- Site Maps added	Review if meets needs.
28.5.20	iw	- Intro updated	
01/07/20	CD	- SA review and conclusions updated	WIP
01/11/20	SH	- Site Assessment work commences	WIP
02/12/20	CB	- Significant restructuring and content added in accordance with 'Booklets next stages 19.6.20' document.	Review

DRAFT

Site Assessment (North Walsham)

Part 1: Settlement Information

1.1. Introduction

This booklet provides a high-level overview of North Walsham as a growth location in the Draft Local Plan. It looks in detail at the promoted sites, identifying which are the most suitable to contribute towards the allocation requirements in this settlement. Collectively the identified sites contribute to the overall housing requirement for the settlement, provide for additional employment development on specifically allocated land, and protect important areas of various types of green open space.

The sites referred to in this booklet are shown together with their reference numbers in Section 2, and, at the rear of the document as an appendix. The maps detail all sites which were subject to consultation at Regulation 18 stage of plan preparation, and any additional sites which were suggested in response to that consultation. In the event that the sites are allocated, their development would be subject to the policies of the plan including the site specific policies in Part 3 of this document.

The intention is that the booklet will be updated throughout the remainder of the plan preparation process. It contains:

- **Part 1** - Contextual background information about North Walsham together with a summary of the Regulation 18 consultation responses from statutory consultees, individuals and town and parish councils.
- **Part 2** - Updated Sustainability Appraisal and assessment for each of the sites considered.
- **Part 3** - The Council's conclusions on the availability and suitability of each of the sites drawing together the Sustainability Appraisal and Site Assessment and the Regulation 18 consultation responses together with the proposed policies which will be applied when planning applications are submitted.

Plan Requirements

North Walsham is one of three identified **Large Growth Towns** in the settlement hierarchy and acts as a district centre where relatively large-scale growth can be accommodated. The Local Plan sets a housing target of **2590** dwellings to be delivered over the Plan period via a combination of small scale 'infill' developments, new allocations and existing commitments. New sites, to supplement those already consented and under construction, suitable for in the region of **2150** dwellings, are necessary to achieve the housing requirement. North Walsham is identified as a Large Growth Town in the proposed Settlement Hierarchy and the proposed strategy considers that the town can accommodate a high level of growth in the Plan period together with the supporting infrastructure.

1.2. Sites Promoted & Considered (Regulation 18)

Residential Site Options

Site Ref	LP Ref	HELAA Ref	Site Name	Site Size (Ha)	Approx Site Capacity
ED1	N/A	H1223	Playing Field, Station Road	3.82	114
NW01/A	N/A	Part of H0683	Land at Norwich Road & Nursery Drive	8.00	160
NW05	N/A	Part of H0683	Roseland	1.48	59
NW06/1	N/A	Part of H0683	Land South and East of North Walsham Garden Centre	28.32	1133
NW07	N/A	Part of H0683	North Walsham Garden Centre	5.21	208
NW08	N/A	H0680	Land To The South Of North Walsham	44.27	1328
NW16	N/A	H0160	Land at End of Mundesley Road	15.46	300
NW17	N/A	H0161	Land West of Melbourne House, Bacton Road	1.02	50
NW18/1	N/A	No Ref	Land At Melbourne House	1.18	47
NW19	N/A	H0929	North Walsham Caravan Park	5.65	226
NW21	N/A	H0163	Land Opposite Brick Kiln Farm, Manor Road	1.85	55
NW22	N/A	H0931	Land At Manor Road	6.65	266
NW23	N/A	H0164	Land Between Yarmouth Road and Field Lane	18.90	340
NW24 & NW43	N/A	H0165	Land Adjacent Mushroom Farm, A149	4.55	120
NW25	N/A	H0932	Land Off Laundry Loke	0.92	37
NW26	N/A	H0166	Land Adjacent Scarborough Hill House Hotel	1.41	60
NW28/1	N/A	H0167	Land at Greens Road	6.50	200
NW28/2	N/A	H0677	Land At Greens Road	10.64	319
NW28a	N/A	H2081	North Walsham Football Club	5.07	80
NW30	N/A	Part of H0683	Ladbroke Engineering, Norwich Road	1.34	54
NW34	N/A	H0169	Land at Spa Common	1.41	42
NW36	N/A	H0170	Land at Little London Road	1.56	46
NW40	N/A	H0944	Adjacent Holmfield, Little London	0.50	20
NW41	N/A	H0159	Tungate Farm, Aylsham Road	42.53	1200
NW42	N/A	H1179	Land Adjacent Happisburgh Road	1.17	47
NW44	N/A	H0945	Paston College Lawns Site	1.47	60
NW46	N/A	H0172	Land at Fernbank, West of Bacton Road	1.36	40
NW47	N/A	H0173	Land Adjacent Royston Cottage, Little London	0.70	21
NW48	N/A	H0174	Land North of Royston Cottage, Little London	0.62	18
NW49	N/A	H0175	Land at 22 Skeyton Road	0.55	6
NW50	N/A	H0176	Land South of Anchor Road	2.33	69
NW51	N/A	H0177	Land at Southcroft, Yarmouth Road	0.92	27

NW54	N/A	No Ref	Land West of Manor Road	9.94	300
NW55	N/A	H0682	Land Between Manor Road & Happisburgh Road	2.96	90
NW56	N/A	H0684	Land at Bradfield Road	0.36	15
NW57	N/A	H0685	Land At Greens Road	2.07	62
NW58	N/A	H0686	Land South Cromer Road	20.12	600
NW59	N/A	H0687/1	Land West Of Bradfield Road	4.08	163
NW60	N/A	H0689	Land Between Lyngate Road And The Street	16.93	677

Mixed-Use Site Options

Site Ref	LP Ref	HELAA Ref	Site Name	Site Size (Ha)	Approx Site Capacity
NW01/B	DS14	Part of H0683	Land at Norwich Road & Nursery Drive	18.6	350
NW08/1	N/A	H0156	Land at Skeyton Road	20.63	396
NW08/2	N/A	H0157	Land West of Norwich Road (B1150)	25.03	800
NW09	N/A	H0158	Land at South Rise	0.53	15
NW11	N/A	H0355	Tungate Road	10.92	328
NW14/53	N/A	H0688	Land at Bradfield Road & Cromer Road	2.46	70
NW15	N/A	H0926	Land At Bradfield Road	17.45	698
NW15/1	N/A	Part of H0926	Land At Bradfield Road	4.47	179
NW20 & NW33	N/A	H0162	Land at Marshgate & Manor Road	16.21	640
NW31	N/A	H0168	Land Rear of East Coast Plastics	0.65	16
NW52	N/A	H2079	Land East of Bradfield Road	2.63	80
NW61	N/A	H0712	Wayside Farm, Skeyton Road	12.05	482
NW62	DS15	H0686	Western Extension	95.00	1800

Employment Site Options

Site Ref	LP Ref	HELAA Ref	Site Name	Site Size (Ha)	Approx Site Capacity
E10	DS16	HE0070	Land off Cornish Way	5.11	N/A

Additional Sites

New sites promoted through or following Reg 18 consultation:

Site Ref	LP Ref	HELAA Ref	Site Name	Site Size (Ha)	Approx Site Capacity
NW15/2	N/A	N/A	Land At Bradfield Road	2.22	30
NW62/A	N/A	N/A	Western Extension	108.31	1800

Withdrawn Sites

The following sites were withdrawn by the promoter during the local plan preparation process.

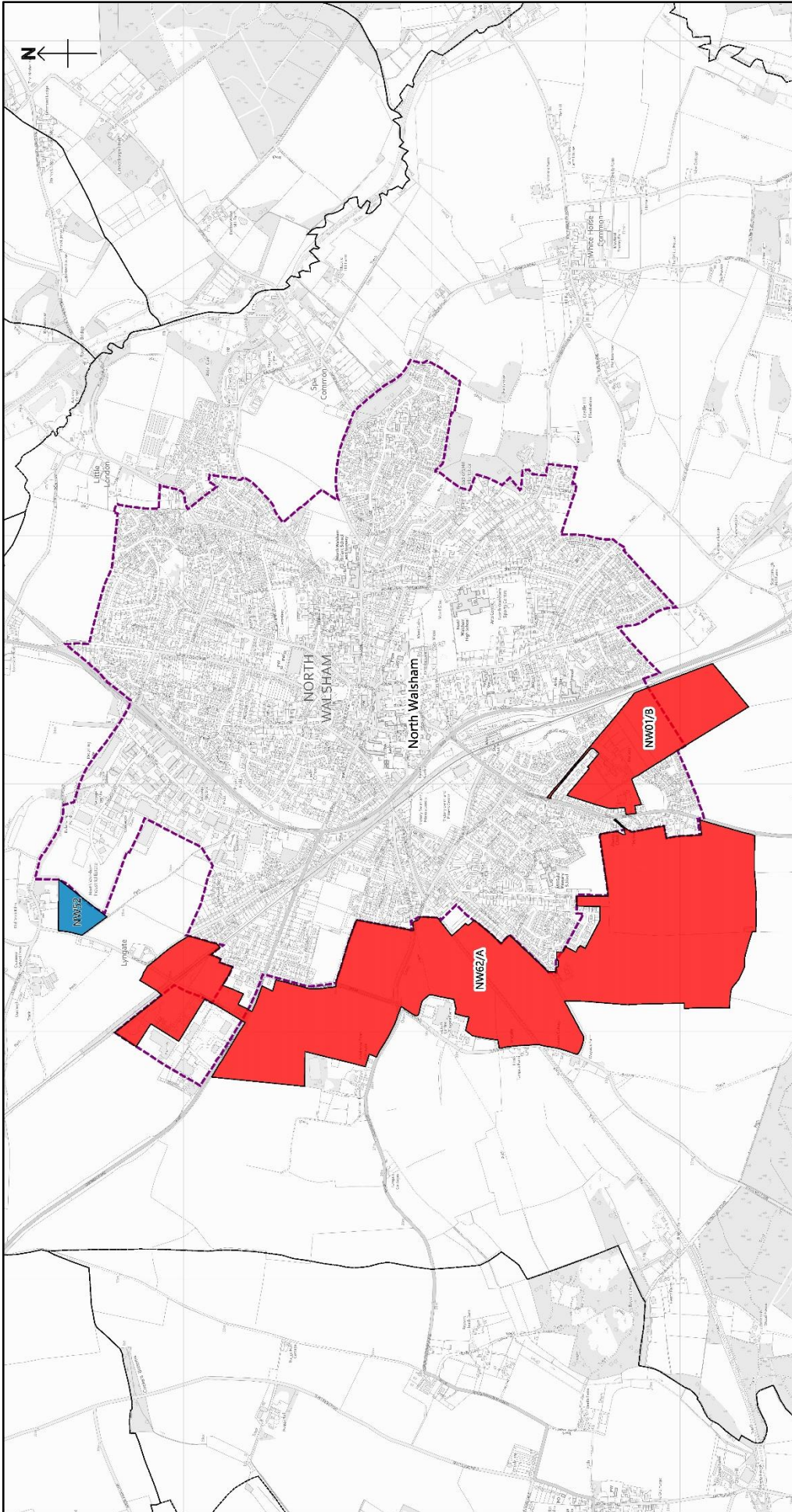
Site Ref	LP Ref	HELAA Ref	Site Name	Site Size (Ha)	Approx Site Capacity	Reason Withdrawn
N/A	N/A	N/A	N/A	N/A	N/A	N/A

Discounted Sites

Many of the sites put forward to the Council are incompatible with the emerging spatial strategy of the Local Plan, are not required to meet development needs, do not require allocation in order to be delivered, are below the minimum site threshold, or, are environmentally constrained. The majority of these sites were eliminated at an early stage through the Housing & Economic Land Availability Assessment (HELAA) and have not been subject to full site assessment. Additional sites which have subsequently been discounted from the process are detailed below:

Further details can be found in the Site Selection Methodology Background Paper and HELAA (Part 1).

Site Ref	LP Ref	HELAA Ref	Site Name	Site Size (Ha)	Approx Site Capacity	Reason Discounted
NW19	N/A	H0929	North Walsham Caravan Park	5.65	226	Site Unavailable
NW25	N/A	H0932	Land Off Laundry Loke	0.92	37	Within Settlement Boundary
NW44	N/A	H0945	Paston College Lawns Site	1.47	60	Site Unavailable



North Walsham - Preferred Sites (Reg 19)

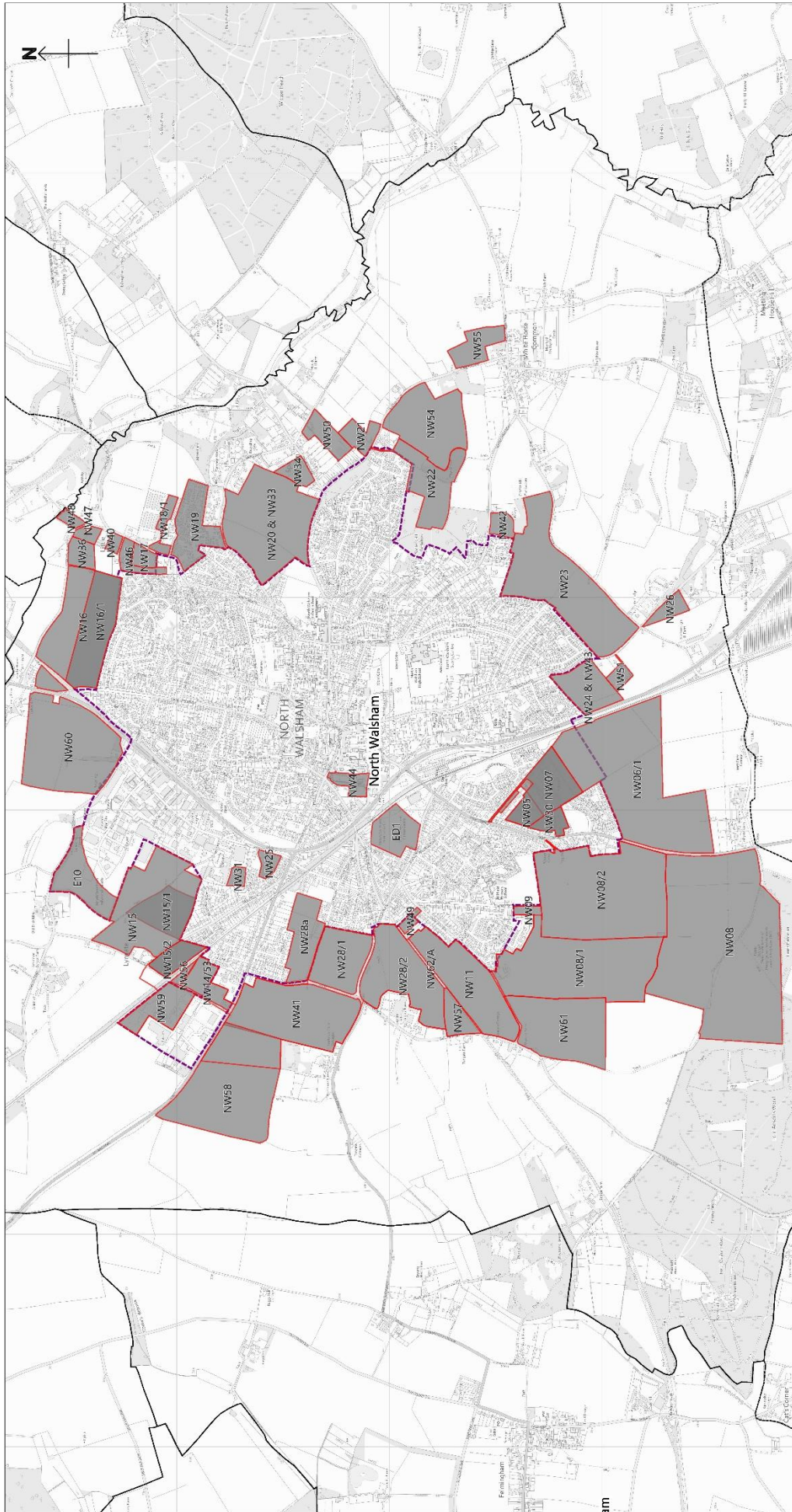
- Preferred Housing / Mixed Use Allocation
- Preferred Employment Allocation
- Existing Settlement Boundary
- Parish Boundary



NOT TO SCALE CB
 03/12/2020

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
 and database right
 2020
 Ordnance Survey
 100018623
 Aerial Photos
 ©Getmapping plc



North Walsham - Alternative Sites (Reg 19)

- Alternative Site Considered
- Parish Boundary
- Existing Settlement Boundary

NOT TO SCALE CB

03/12/2020

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 01263 513811
www.north-norfolk.gov.uk

© Crown Copyright and database right 2020
 Ordnance Survey 100018623
 Aerial Photos ©Getmapping plc

1.3. Background Information

North Walsham is identified as a Large Growth Town in the proposed Settlement Hierarchy. This means it has been identified as one of three towns, the others being Cromer and Fakenham, where large scale growth is promoted.

Characteristics

North Walsham is the largest town in the District with a recorded population of 12,634 at the 2011 census. The town offers a broad range of services and local employment. It has strong links with Norwich, with the close proximity of the city encouraging high levels of out commuting for jobs and other services. Two sites for mixed use allocation have been identified for North Walsham which, if allocated would be suitable for approximately 2,150 new dwellings and other uses across the two sites. When added to potential small scale developments within the town this Plan proposes that some 23% of all housing growth in the District is located in North Walsham which by the end of the Plan period would see the population of the town increase by around 5,000.

Employment (to update with findings of the employment study)

The town's industrial businesses are focused on manufacturing of machinery and equipment, plastics products and metal fabrication. North Walsham has recorded a consistent level of premises take-up and, along with Fakenham, is a primary industrial node in North Norfolk. North Walsham's industrial estates are reaching capacity and further employment land is required to be available to the market in the short term to ensure continuity of the town's growth.

Town Centre & Retail

North Walsham has the third largest retail provision in the District in terms of floorspace and is classed as a Large Town Centre in the proposed retail hierarchy where new retail and town centre investment should be directed. Expenditure retention rates, (a measure of what proportion of available expenditure is retained in the town) for convenience shopping remain high at 78% due to the presence of national chains in the town centre and edge/out of centre locations. This is significantly lower for comparison (28%) and food/beverage expenditure (14%) in large part due to the draw of Norwich and the relatively limited range of goods available locally. The town centre itself consistently has the highest recorded shop vacancy rate in the District at 10 - 17% and would benefit from qualitative improvements and investment in the retail offer.

The evidence suggests that the scale of growth proposed in the town is likely to increase the available retail expenditure and notwithstanding the vacancy rate and shifts away from town centre shopping would support the provision of further retail floorspace for both convenience and comparison goods. The health and vitality of North Walsham town centre is relatively fragile and it would be vulnerable to impacts of development over 2,500 sq.m gross.(the national default threshold for impact tests). A locally set threshold of 500 sq.m gross is appropriate for retail and leisure development in North Walsham (see Retail & Town Centres), reflecting the scale and vulnerability of the town centre and to ensure the impacts of out of centre development are robustly considered.

There is an identified need, in the mid to long term, for comparison and convenient goods shopping and to a lesser extent food/beverage floor space. Vacant shop units could reasonably accommodate up to 70% of the identified projections in the first 10 years of the Plan period and should remain a focus for investment. Large scale development sites are not readily available within the defined Primary Shopping Area and site assembly may be complex due to the many Listed Buildings. Even so, the 'town centre first' approach embodied in national and local policy should be rigorously applied. Alternatively, future growth requirements could be provided through intensification within the existing out of centre retail area (Waitrose), but only if the sequential and impact tests are met.

Infrastructure (to update following further progress on the IDP)

The proposed land allocations have been developed in conjunction with advice and information from infrastructure providers and statutory consultees and large-scale growth without supporting infrastructure would not be acceptable. **Background Paper 4 - Infrastructure Position Statement** provides more information and has informed the **Infrastructure Delivery Plan**.

The Education Authority has indicated that the high level of growth proposed in the town will necessitate the provision of a new primary school.

The railway bridges on the western approaches to the town along the Cromer Road, Aylsham Road & Norwich Road provide a challenge for large or heavy goods vehicles travelling through the town and force the traffic through residential areas and along unsuitable residential streets. A western 'link road' between the B1150 (Norwich Road), the B1145 (Aylsham Road) and A149 (Cromer Road) would help alleviate some of these issues.

North Walsham is not identified in the Strategic Flood Risk Assessment as being at risk of fluvial flooding but there are a number of un-named drains with potential to present a flood risk. Predominantly isolated and minimal pockets of water ponding on roads, gardens and other open spaces pose a risk of surface water flooding.

Anglian Water identified that off-site water mains reinforcement is required in certain parts of the town and that enhancement to the foul sewerage network capacity will be required.

The scale of growth envisaged in the town will require improvements in health service provision.

In summary, the main infrastructure considerations are:

- traffic management and congestion in the town including access to industrial estates and town centre and low bridge restrictions, particularly for large or heavy goods vehicles;
- lack of a bus terminus/ interchange;
- limited capacity at schools particularly at primary school level;
- insufficient capacity in health services to support future growth;
- minerals resource allocation MIN 115 – Land at Lord Anson's Wood, near North Walsham;
- enhancements to the sewerage network capacity and off-site water mains reinforcement are required in some parts of town;
- surface water drainage capacity;
- insufficient capacity in health services to support large scale growth;
- potential electricity supply constraints

As development takes place it will need to be served by appropriate supporting physical infrastructure and services. All developments are required to address any identified shortages in infrastructure to the extent necessary to make the specific proposal acceptable. Policy SD5 and Background Paper 4 explain this process.

Education

There are a total of four schools within North Walsham: North Walsham Junior School, North Walsham Infant School and Nursery and Millfield Primary provide primary education while North Walsham High School provides secondary education. North Walsham High School has a wide catchment and provides secondary education for Antringham & Southrepps, Bacton, Mundesley, Swanton Abbott and Worstead.

Norfolk County Council Education Authority stated:

Although there is current capacity at primary schools in North Walsham, the growth levels proposed in the emerging local plan will necessitate the provision of a new primary school. The exact location of the school within the site has not yet been determined and would be influenced by catchment areas the suitability of sustainable connections. Further consideration to this will be given through the proposed master planning approach in the subsequent stages of the development of the emerging Local Plan.

Affordable Housing Zone & Policy Percentage

North Walsham is identified in Zone 1 for affordable housing with a plan requirement for 15% of the total dwellings provided on schemes of 6+ dwellings.

Connectivity

North Walsham, in general, has reasonable connectivity and the catchment schools are within walking distance from most of the residential areas. The town centre is also within walking and cycling distance from most residential areas. The town has a range of employment, shopping and leisure opportunities. North Walsham offers sustainable transport options with regular bus and rail services available to a number of destinations including Sheringham, Cromer and Norwich. Rail services to Norwich take 30mins are every hour. The bus stops are located through-out the town, however, the town does not have a bus station.

Green Infrastructure

All development in North Walsham should consider the Green Infrastructure Strategy for the town and incorporate green infrastructure proposals as outlined in the Action Plan. Five 'G.I. Action Zones' have been identified for North Walsham:

- Weavers Way Corridor
- Paston Way Corridor
- Witton Heath to Bacton Corridor
- River Ant & Dilham Canal Corridor
- Town wide G.I. Improvements

Sports Pitch Strategy

Football

Provision of a new 3G pitch at North Walsham High School to reduce pressure on youth training and match day venues.

Tennis

Potential to provide floodlighting on the Recreation Ground tennis courts, however this is next to the High School which currently has floodlighting and has surface upgrades planned.

Rugby

The provision of a new 3G pitch at the High School should also include shockpads.

Over the plan period new rugby pitch provision will be required (one minimum).

Floodlights for North Walsham RFC.

Open Space Requirements

The 2019 North Norfolk Open Space Assessment sets the quantum of open space for new residential developments across the district for the plan period. Assessed against these standards the study

identifies that North Walsham has a requirement for all types of open space, particularly Allotments, Amenity Greenspace and Parks and Recreation Grounds.

Constraints & Opportunities

North Walsham does not have the significant environmental and landscape constraints that are found elsewhere in the District. It is not in the AONB, close to the Broads or in proximity to any international designated sites. Whilst over the Plan period it is expected that a process of re-development, infill developments, and changes of use will continue to provide a supply of new homes and other uses, these opportunities are relatively modest and will not address the identified need for new homes in particular. New greenfield allocations are therefore necessary in order to deliver the required growth. There are a range of factors which influence the potential location of development in North Walsham including the need to take into account the availability of infrastructure and need for new infrastructure.

North Walsham has a broad range of services and employment opportunities and has good transport connections including road connections across the District. The town has a main line rail station which provides direct rail access into Norwich, Hoveton & Wroxham, Cromer and Sheringham. The town does not have a bus station or a focused bus interchange area.

In summary, the main considerations which influence the suggested location of development sites are the need to:

- consider the delivery of new infrastructure, in particular, a new link road around the west of the town;
- locate developments where they are, or can be connected, to key services and the town centre preferably by walking, cycling or public transport or via better quality roads;
- enhance the capacity in primary schools;
- avoid locations which are detached from the town and not well related to existing built up areas;
- avoid increases in traffic passing through the town centre;
- respect the quality of the surrounding landscape, particularly to the north and east of the town.

Demographics

Population

Population in North Walsham: 12,696

	Number	%	District Comparison (%)
Aged 0 to 15	2,106	16.9	14.5
Aged 16 to 29	4,002	32.1	27.2
Aged 30 to 44	2,044	16.4	14.4
Aged 45 to 64	3,168	25.4	29.7
Aged 65+	3,249	26.1	28.8

Housing Stock

	Number	%	District Comparison (%)
Detached house or bungalow	2,143	36.7	44.0
Semi-detached house or bungalow	1,891	32.4	28.8
Terraced house or bungalow	1,073	18.4	16.2
Flat, maisonette or apartment - Purpose-built block of flats	536	9.2	6.4
Flat, maisonette or apartment - Part of a converted or shared house	50	0.9	2.7
Flat, maisonette or apartment - In a commercial building	75	1.3	1.2
Caravan or other mobile or temporary structure	77	1.3	0.8

Affordability

Location	Affordability Ratio
North Walsham East	8.26
North Walsham North	7.43
North Walsham South	7.82
North Norfolk	8.72

Data Source: Village Assessment & Settlement Profiles Topic Paper (March 2018), Census Data.

Parish Boundaries

One of the site options (NW48) extends partially outside of the North Walsham parish boundary into the adjacent parish of Knapton.

Services

North Walsham offers a wide range of shops and services which serve residents of the town and the surrounding area.

Services & Facilities		
Category	Services	Conclusion
Education	<ul style="list-style-type: none"> • North Walsham Infant School & Nursery • North Walsham Junior School • Millfield Primary School • North Walsham High School 	There are a range of education facilities within the town.
Health care	<ul style="list-style-type: none"> • Paston Surgery • Birchwood Surgery • North Walsham and District War Memorial Hospital • A number of private and NHS Dental Care Practices. 	There are a range of healthcare opportunities within the town meeting the needs of the residents and the wider community.
Retail	30 comparison retail units and 7 convenience retail units within the town's primary shopping area.	Extensive choice of comparison and convenience goods shopping within the town centre.
Public transport	<p>Regular bus services to Cromer, Stalham, Norwich & Great Yarmouth.</p> <p>Regular Greater Anglia train services to Cromer, Sheringham, Hoveton and Norwich.</p>	Good public transport to a number of other towns and good connectivity to Norwich, a 'higher order' settlement.
Employment opportunities	A number of opportunities for employment within the sectors of: Wholesale and retail trade; Human health and social work activities; Manufacturing; Education; Construction; and Accommodation and food service activities.	It is considered that there are extensive employment opportunities within the town.

1.4. Constraints

There are a range of factors which influence the potential location of development in North Walsham, including highways & transport, connectivity to the town centre and landscape considerations. There is also the need to take into account the existing services and infrastructure in the town.

Built Environment

North Walsham Conservation Area covers the historic core of the town and extends, in part, south along the Yarmouth Road.

There are a total of 103 Listed Buildings in North Walsham, two which are Grade I (Church of St Nicholas and the Market Cross which is also a Scheduled Ancient Monument) and four Grade II*. In addition, there are four Scheduled Ancient Monuments in total and 38 buildings have been included on the Local List as important buildings.

Natural Environment

Environmental Designations

Bacton Woods, a designated Ancient Woodland is situated to the east of the Town.

Bryant's Heath, a designated SSSI, is situated to the west of the Town.

There are a small number of County Wildlife Sites (CWS) on the fringe of North Walsham. Alder Carr and Spa Common, the closest to the built form located to the east of the settlement. The Weaver's way, which connects Cromer to Great Yarmouth runs is designated as a CWS.

Landscape Character

The North Norfolk Landscape Character Assessment (2018) identifies that the majority of the town is situated within the Low Plains Farmland Character Area. The area to the north and east of the town is categorised by the River Ant and Tributaries Character Area.

The **Low Plains Farmland** Character Area is characterised by a flat or gently undulating open landscape with long, uninterrupted views, predominantly arable land use and dispersed rural settlements, including the expanding market town of North Walsham. The landscape becomes less enclosed and wooded towards the coast, as a result of 20th Century agriculture and hedgerow removals.

The vision for this landscape character area is a well-managed and actively farmed rural landscape that makes the most of field margins for biodiversity and contains a mosaic of farmland, heathland and woodland to provide a network of semi-natural features. New development is integrated within the existing settlements where it reinforces traditional character and vernacular. The landscape retains a rural character and dark skies at night.

The **River Valleys (River Ant and Tributaries)** Character Area provides a strong contrast to the typically open, large-scale arable landscapes through which they pass, being characterised by a pastoral land use, a high level of tree cover and a linear settlement pattern, with significant local variations in land cover and, consequently, in views.

The vision for this landscape character area is of intimate, small-scale landscapes with a wide variety of land uses / habitats, offering a contrast to the more expansive, open, large-scale arable farming and coastal landscapes that surround the valleys. New development should be appropriate in scale, unobtrusive and readily accommodated into its landscape setting. Woodland and hedgerows should be a major landscape element, helping to contain development. The linear valley form should be apparent, and should dictate land use and development form. Valley sides should offer some degree of transition between the contrasting scales of the valley floors and surrounding arable farmlands.

Flood Risk

The **North Norfolk Strategic Flood Risk Assessment (SFRA) (2017)** climate change flood risk layers in regard to fluvial, tidal and surface water flooding indicates that the town is subject to pockets of surface water flooding, predominantly along the roads through the town. The majority of the town is in Flood Zone 1. To the north of the town the North Walsham and Dilham Canal represents an area of Flood Zone 3a.

Coastal Change Management Area

N/A

There are a range of factors which influence the potential location of development in North Walsham including, environmental and landscape considerations and the need to take into account available infrastructure.

In summary, the main considerations which influence the suggested location of development sites are the need to:

-
-
-
-
-

1.5. Habitat Regulations Assessment / Appropriate Assessment

TO BE ADDED

DRAFT

1.6. Statutory Consultee Responses (Regulation 18)

The following section provides a summary of the representations received in relation to each of the proposed sites during the Regulation 18 consultation period of May - June 2019.

The full responses to the consultation can be viewed in the Regulation 19 **Consultation Statement**. Where the term 'General Support for the allocation' has been used this is typically in relation to comments made by owners, developers and their agents who are promoting the development of sites.

Many of the sites were subject to standard comments from a number of statutory consultees which sought minor changes to policy wording to either reflect national advice or improve the effectiveness of the policy. The intention is that these will be incorporated into the Plan at the next stage'.

Highways

NW01/B

Policy DS14: Land at Norwich Road & Nursery Drive

Sustainability

All schools are within acceptable walking distance. North Walsham has good public transport links with both bus and rail being available. Employment, shopping and leisure are all available locally. Pedestrian access to the town relies on crossing the A149, the existing traffic signal junction includes a facility for the movement.

Safety

Whilst it is recognised that Nursery Drive presently serves some housing, along with an operational garden centre. The road is a narrow private road, without footways and doesn't appear to have scope for improvement. It is suspected that the visibility splays at Norwich Road do not meet the requirements of MfS. The road is not considered to be appropriate for an increased level of usage. More than one point of vehicular and pedestrian/cycle access is required to the site and to aid permeability, it should be link with the existing developments to the north and south of the site.

Mitigation

The development must have at least two points of vehicular access. The development should incorporate links to the sites located to the north and south. The development should not permit additional vehicular access via Nursery Lane. Congestion at the B1150/A149 traffic signal junction is a known problem. Submission of Transport Assessment (TA) required, along with provision of any identified development traffic mitigation measures. The traffic analysis should as a minimum include the traffic signal junction between the B1150, A149 and Grammar School Road. As the development strategy includes linking with the existing developments, the TA should consider impact at their accesses.

NW62

Policy DS15: North Walsham Western Extension

Will be dealt with separately - as part of Development Brief production.

E10

Policy DS16: Land off Cornish Way

The site is understood to be currently allocated and continues to be supported. The requirement to preserve the ability for the site to be accessed from Bradfield Road is noted. It should be highlighted that Cornish Way is not presently public highway for its full extent.

Sustainability

The site is well located for access from North Walsham and the B1145 North Walsham Bypass is a bus route.

Safety

The existing junction of B1145 is of an appropriate standard to support further development of the employment area.

Mitigation

A Transport Assessment would be required to assess whether off-site highway mitigation works are necessary.

Cumulative Comments for Settlement

Until proposals for DS 15 have been fully developed, it will not be possible to fully understand the cumulative impact of the allocations proposed at North Walsham.

However, site reference DS 14 is likely to contribute to the ongoing congestion concern at the A149/B1150 traffic signals, applications to develop that site should include analysis of impacts at the junction.

The scale and form of employment proposed at DS 16 will inform the mix and volume of vehicles that would be likely to access the site. When those are known, it will be possible to take a view on likely impact at North Walsham.

Minerals & Waste

NW01/B

Policy DS14: Land at Norwich Road & Nursery Drive

LP739 -The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

NW62

Policy DS15: North Walsham Western Extension

LP739 -The following wording should be included in the allocation policy - The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.

E10

Policy DS16: Land off Cornish Way

LP739 - The following wording should be included in the allocation policy - The site is with the consultation area for a safeguarded mineral or waste site or adopted allocation, defined by the adopted Norfolk Mineral and Waste safeguarding policy. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to the safeguarding of such sites, to the satisfaction of the Mineral Planning Authority.

Utilities Capacity

Anglian Water

NW01/B**Policy DS14: Land at Norwich Road & Nursery Drive**

LP398 - There is an existing water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take this into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. Amend policy DS14 to include reference to existing water main located on site and that this is a consideration for the applicant. Suggested that the following wording be added to Policy DS14: '9. That suitable access is safeguarded for the maintenance of water supply infrastructure.'

NW62**Policy DS15: North Walsham Western Extension**

LP356 - existing borehole located within the proposed North Walsham Western extension which is connected to North Walsham Water Treatment Works (NWLWW) which supplies potable (clean) water to a wider area including North Walsham. The Water Treatment Works is located at Stump Cross, Norwich Road, North Walsham adjacent to the site boundary. It is important to ensure that adequate safeguards are put in place to ensure that the proposed mixed use development does not adversely affect the continued operation of Anglian Water's existing borehole, associated infrastructure and the North Walsham Water Treatment Works for our customers. This existing infrastructure is critical to enable us to carry out Anglian Water's duty as a water undertaker. Policy DS 15 as drafted does not make reference to the existing boreholes, how this is protected from potential polluting activities or how access to this will be maintained both during and after construction. Anglian Water would require the applicant(s) for this site prepare an appropriate risk assessment which considers the risk and protection of the source, both during construction and once developed. The risk assessment should identify any risk to source and mitigation. As such we would ask that the policy make specific reference to this requirement. The borehole is currently located in an agricultural field it is therefore important to ensure this land is not developed in such a way that would prevent being able to access and maintain the borehole. Consideration should be given to the extent of the proposed allocation site, the distribution of the proposed uses within the allocated site and how to ensure that the area in and around the borehole will remain undeveloped. The area in and around the borehole site should remain undeveloped to allow continued access by Anglian Water. The following wording is suggested for consideration in Policy DS15: 'A detailed groundwater risk assessment will be required to demonstrate no adverse impact from polluting activities on the groundwater source. Proposals will be supported where it can be demonstrated to the Council in consultation with the water undertaker that pollution to existing groundwater sources can be avoided or suitably mitigated. There is an existing borehole, horizontal audit and water mains within the boundary of the site and the site layout should be designed to take this into account. Proposals should demonstrate how access to the existing boreholes will be safeguarded for operational and maintenance purposes by the water undertaker.'

E10**Policy DS16: Land off Cornish Way**

No comment received.

Environment Agency

No comments received.

Education**Norfolk County Council**

While the emerging Local Plan does not raise any immediate issues for the County Council as education provider the following point need to be made: North Walsham (Western Extension) – The County Council supports the provision of a new primary sector school as part of the proposal for 1,800 new homes to the west of North Walsham (Policy DS15).

Others

Historic England

(Comments on all Preferred Sites)

LP705 - It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal.

To that end we make the following suggestions.

- a) The policy and supporting text should refer to the designated assets and their settings both on site and nearby. By using the word 'including' this avoids the risk of missing any assets off the list.
- b) The policy should use the appropriate wording from the list below depending on the type of asset e.g. conservation area or listed building or mixture
- c) The policy and supporting text should refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above. Where a site has the potential to affect a heritage asset, we would expect the following typical wording within the policy:

- listed building 'Development should preserve the significance listed building and its setting'. This is based on the wording in Part 1, Chapter 1, paragraph 1 (3) (b) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- conservation area 'Development should preserve or where opportunities arise enhance the Conservation Area and its setting'. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- registered park and garden - 'Development should protect the registered park and garden and its setting.'
- scheduled monument 'Development should protect the scheduled monument and its setting.'
- combination of heritage assets 'Development should conserve and where appropriate enhance heritage assets and their settings.' This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014

Alternatively, you may prefer to adapt the above and incorporate the following, 'preserve the significance of the [INSERT TYPE OF HERITAGE ASSET] (noting that significance may be harmed by development with the setting of the asset)'. This is perhaps technically more accurate but perhaps slightly less accessible.

There may be occasions where particular mitigation measures proposed should also be mentioned in policy e.g. landscaping, open space to allow breathing space around heritage asset etc.

Sometimes it may be appropriate to present proposed mitigation measures (both to heritage and other topics) in a concept diagram as this quickly conveys the key policy intentions.

By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.

NW01/B

Policy DS14: Land at Norwich Road & Nursery Drive

LP705 - Whilst there are no designated heritage assets within the site, Stump Cross/Wayside Cross which lies to the west of the site is a scheduled monument and grade II listed. However, development of the site is likely to have limited impact on this heritage asset, owing to the nature of the asset itself.

NW62**Policy DS15: North Walsham Western Extension**

This site is a large mixed use extension to the west of North Walsham. Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the west of the site at Bradmoor Farm and Stump Cross/Wayside Cross which lies to the east of the site and is a scheduled monument and grade II listed. Development of this site has the potential to impact upon the setting of these designated heritage assets.

There is currently no mention of these designated heritage assets in paragraph 16.36. There is also no mention of the heritage assets in the policy. This should be amended to make reference to the heritage assets. .

Natural England**NW62****Policy DS15: North Walsham Western Extension**

Policy DS 15 Site allocation NW62 is of significant size and within 1km of Bryants Heath SSSI which is linked directly via a public footpath. Due to the lack of alternative green space in the area we would anticipate an increase recreational use of the designated site. To mitigate disturbance impacts, the proposal will require suitable onsite open space that is proportionate to the scale of the development and sufficient to absorb the routine recreational requirements for the anticipated number of residents (a country park or equivalent). In addition, this allocation should provide significant contributions to net gain and opportunities for habitat creation as in line with emerging Policy ENV 4. Historically, the land parcels adjacent to the site were heathland and recreation of this habitat could provide an extension and buffer to the SSSI, potentially supporting wildlife whilst integrating recreation. Natural England would welcome a conversation about net gain and GI opportunities.

Statements of Common Ground (SoCG)

None.

1.7. Summary Consultation Comments (Regulation 18) June 2019

The following section provides a summary of the representations received in relation to each of the proposed sites during the Regulation 18 consultation period. These are grouped into individuals, parish & town councils, plus statutory bodies and other organisations. The full responses to the consultation can be viewed in the Regulation 19 **Consultation Statement**. Where the term ‘General Support for the allocation’ has been used this is typically in relation to comments made by owners, developers and their agents who are promoting the development of sites.

Many of the sites were subject to standard comments from a number of statutory consultees as detailed above which sought changes to policy wording to either reflect national advice or improve the effectiveness of the Policy. The intention is that these will be considered and incorporated into the Plan if necessary.

NW01/B

Policy DS14: Land at Norwich Road & Nursery Drive

Individuals	Number Received	Summary of Responses (Site Policy DS14)
Summary of Objections	1	The proposal received one objection. Existing issues with congestion. Concern about capacity at doctors and dentist.
Summary of Support	2	Two support this site, recognising North Walsham as the largest urban area in North Norfolk and the need for it to grow. However comment on concerns with the existing road infrastructure, with the town suffering from traffic congestion exacerbated by residential growth in the town and the lack of pedestrian and cycle routes. Suggest that it would be desirable to reroute the A149 and to improve the railway station. Also for the town centre to become a Conservation Redevelopment Zone and be pedestrianised. Development should be designed to be sensitive to the environment and Section 106 funding must come to North Walsham (and other NNDC towns) first and work must be undertaken to improve infrastructure before homes are signed off/sold.
Summary of General Comments	2	Two comments received. Concerns over the impact of the proposal on the existing road system and on drainage. Agree with the requirement for a Development Brief but think policy is insufficiently precise in its treatment of utility provision. Must be a requirement to demonstrate sufficient capacity in electricity and telecommunications to meet the needs of any proposed development. Would like additional wording to make specific North Walsham’s requirement for a well-designed development with proper provision of essential utilities.
Overall Summary		Limited comments received on this policy. Overall support for this site, recognising North Walsham as the largest urban area in North Norfolk and the need for it to grow. However there are concerns with the existing road infrastructure, traffic congestion, lack of pedestrian and cycle routes, capacity at doctors and dentists, electricity and telecommunications and issues with drainage. Suggest that it would be desirable to reroute the A149, to improve the railway station and for the town centre to become a Conservation Redevelopment Zone and be pedestrianised. Development should be designed to be sensitive to the environment and for Section 106 funding to come to North Walsham (and other NNDC towns) first and work undertaken to improve infrastructure before homes are signed off/sold. Suggest

		additional wording requiring a well-designed development with proper provision of essential utilities.
--	--	---

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

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS14)
Objection	1	General support for site allocation, Anglian Water advised that policy wording should be amended to safeguard access to existing water mains located on the site. Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies.
Support	2	
General Comments	2	

NW62

Policy DS15: North Walsham Western Extension

Individuals	Number Received	Summary of Responses (Site Policy DS15)
Summary of Objections	10	A number of objections raise concern over the potential impact on the environment; the loss of a large area of greenspace / agricultural land, adverse landscape impact, impact on public footpaths including Weavers Way and wildlife and biodiversity impact. There needs to be an approach to local planning that addresses the Climate Emergency. Suggest that the scheme should include cycleways, a commitment to carbon offsetting, use of renewable technology, rainwater harvesting, electric car charging points, passivhaus/ carbon neutral homes. Need for social housing. One comments that this would create a commuter town rather than local employment and will increase rather than reduce the carbon footprint. Potential impact on the site of the 1381 Battle of North Walsham, significant in local and social history. Many raise concern over the infrastructure; existing issues with traffic, pollution, safety concerns on Aylsham road. Vital infrastructure has been neglected resulting in the loss of industry in the town. How Coltishall is going to deal with the extra cars. Some acknowledge that there is a need for a link road, to remove HGV's from local streets but consider it necessary to extend it to the industrial estate and to ensure that it is in place before development commences. How will it be funded and will it actually be used, problems along Station Rd and Mundesley Rd might not be addressed. No access should be available from development onto Skeyton Road. Concern that development could result in the loss of amenity for local residents. Concern about capacity of healthcare, schools, refuse collection, drainage, water supply, national grid, policing, buses etc. Need Social housing in North Walsham. Suggestions that other locations such as on the outskirts of

		Norwich would be favourable over this site and consider the town has reached capacity. One proposes a new alternative site, perceived to be more suitable, having less impact on the natural environment and suggests that it should be compulsorily purchased.
Summary of Support	5	Agrees that North Walsham needs an expansion and supports the link road between Norwich Rd and Cromer Rd but would need to extend onto the industrial estate. Otherwise high vehicles will still go through town centre. Existing road infrastructure is unsuitable and there are a lack of pedestrian and cycle routes. Would require an increase in public amenities, access to quality play park provision is vital. Section 106 funding must come to North Walsham before houses are signed off. B1145 improvements required. Questions the suitability of the link road and suggests that rerouting the A149 would be desirable. Concerns over traffic. Improvements needed to the railway station and suggestions that the town centre should become a Conservation Redevelopment Zone and be pedestrianised.
Summary of General Comments	12	Agree in principal. This provides an opportunity to build green and sustainable buildings and be a flagship site for sustainability. No development should be built until infrastructure is in place. The new link road will provide opportunities for industry and businesses and opens town to growth and address current traffic issues. However others feel that the road will only stop certain amount of traffic and push more vehicles along Norwich Rd. Need to ensure the road extends over the railway line to allow access to the industrial estate and need to improve public transport links and pedestrian links. There is a lack of employment opportunities. Concerns over parking and the impact on the town centre and impact on amenity of existing residents. Will result in the loss of agricultural land. Need to provide buffers and open grassland. Some concerns over additional pressure on school, healthcare capacity and drainage. Suggestions that other sites should be prioritised first, including brownfield sites, and as part of existing development. Seek an increase in percentage of social rented housing on this site. Seeking a comprehensive traffic impact study for the town as a whole. Must provide GI. Seeking a study of the impact of the development upon health on residents and how there need will be met. Evidence that there is sufficient capacity in electricity and telecommunications.
Overall Summary		Some support for the expansion of North Walsham acknowledging the need for a link road (extending to the industrial estate) but questions how it will be funded, if it will actually be used and if it will resolve current issues on Station Rd and Mundesley Rd. Concern that North Walsham lacks the infrastructure necessary to accommodate growth. Existing traffic issues in the town and a lack of pedestrian and cycle routes. Concerns over parking, the impact on the town centre and impact on amenity of existing residents. Lack of employment opportunities. Concerns over the potential impact on the environment; loss of a large area of greenspace / agricultural land, adverse landscape impact, impact on wildlife and biodiversity and Weavers Way, impact on the site of the 1381 Battle of North Walsham. There needs to be an approach to local planning that addresses the Climate Emergency and a number of suggestions made to offset carbon in the development. Concern about capacity of healthcare, schools, refuse collection, drainage, water supply, national grid, policing, buses etc. Need for social housing. Would require an increase in public amenities, access to quality play park

		<p>provision is vital. Section 106 funding must come to North Walsham before houses are signed off. B1145 improvements required and no access should be available from development onto Skeyton Road. Need to provide buffers and open grassland. Suggestions that other sites should be prioritised first, including brownfield sites, and as part of existing development. Improvements needed to the railway station and suggestions that the town centre should become a Conservation Redevelopment Zone and be pedestrianised. Seek a comprehensive traffic impact study for the town as a whole, a study of the impact of the development upon health on residents and how there need will be met and evidence that there is sufficient capacity in electricity and telecommunications.</p>
--	--	---

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

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS15)
Objection	4	General support for site allocation. Anglian Water advised that policy wording should be amended to safeguard operation of Anglian Water's existing borehole and associated infrastructure. Natural England expressed support for suitable on-site open space and, along with the National Wildlife Trust, sought specific reference within the policy to biodiversity net gain and the creation of habitats and GI corridors. NCC (Children Services) support the provision of a new primary sector school and NCC (M & W) provided supporting comments to add to appropriate site policies. The Battlefields Trust sought specific reference within the policy to the need for archaeological surveys. Some objections were based around the preference for an alternative site and concerned that there was over reliance on the site allocation to deliver development and that significant infrastructure improvements would be required to accommodate growth. Concerns also raised about the local planning approach to climate change and the need for the policy to enable a community led development approach.
Support	3	
General Comments	4	

E10

Policy DS16: Land at Cornish Way

Individuals	Number Received	Summary of Responses (Site Policy DS16)
Summary of Objections	1	The proposal received one objection. Concerns that North Walsham lack the infrastructure necessary to accommodate growth and improvements, including a road connecting to Bradfield Road, should be provided before development starts. This would help to encourage

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

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

Statutory & Organisations	Number Received	Combined Summary of Responses (Site Policy DS16)
Objection	1	Limited response received. Historic England sought consistency in approach to heritage assets and requested consistent wording. NCC (M & W) provided supporting comments to add to appropriate site policies.
Support	0	
General Comments	1	

Part 2: Assessment of Sites

2.1. RAG Assessment Matrix

The following table summarises the site assessment results and adopts the traffic light system to 'grade' the merits of the site (with green representing those sites contributing significantly towards the sustainability objectives and considered as being the most suitable for development). **Full details can be found in the Site Assessment and Sustainability documents (LINKs)** **What document is 'Site Assessment'?**

Site Ref	Site Name	Site Size (ha)	Proposed Use	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Uses
E10	Land at Cornish Way	5.31	Employment	E10	Previously Allocated and subject to planning permission for part of site. Discounted from further consideration.											
ED1	Playing Field, Station Road	3.82	Residential	114	Green	Yellow	Yellow	Green	Yellow	Yellow	Yellow	Yellow	Green	Green	Orange	Green
NW01/A	Land at Norwich Road & Nursery Drive	8.00	Mixed use	160	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green
NW01/B	Land at Norwich Road & Nursery Drive	18.50	Mixed use	350	Green	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Green
NW05	Roseland	1.48	Residential	59	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green
NW06/1 (Forms Part of NW01/B)	Land South and East of North Walsham Garden Centre	28.32	Residential	1133	Green	Green	Green	Yellow	Yellow	Green	Yellow	Green	Green	Green	Green	Yellow
NW07 (Forms Part of NW01/B)	North Walsham Garden Centre	5.21	Residential	208	Green	Green	Yellow	Yellow	Green	Green	Green	Green	Green	Green	Yellow	Green

Site Ref	Site Name	Site Size (ha)	Proposed Use	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Sites
NW08	Land To The South Of North Walsham	44.27	Residential	1328												
NW08/1 (Forms Part of NW62/A)	Land at Skeyton Road	20.63	Mixed use	396												
NW08/2 (Forms Part of NW62/A)	Land West of Norwich Road (B1150)	25.03	Mixed use	800												
NW09 (Forms Part of NW62/A)	Land at South Rise	0.53	Residential	15												
NW11 (Forms Part of NW62/A)	Tungate Road	10.92	Residential	328												
NW14/53 (Forms Part of NW62/A)	Land at Bradfield Road & Cromer Road	2.45	Mixed use	70												
NW15	Land At Bradfield Road	17.45	Mixed Use	698												
NW15/1	Land At Bradfield Road	4.47	Mixed Use	179												
NW15/2 (Forms Part of NW62/A)	Land At Bradfield Road	2.22	Residential	30												
NW16	Land at End of Mundesley Road	15.46	Residential	300												
NW17	Land West of Melbourne House, Bacton Road	1.02	Residential	50												

Site Ref	Site Name	Site Size (ha)	Proposed Use	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Sites
NW18/1	Land At Melbourne House	1.18	Residential	47												
NW19	North Walsham Caravan Park	5.65	Residential	226												
NW20 & NW33	Land at Marshgate & Manor Road	16.21	Mixed use	640												
NW21	Land Opposite Brick Kiln Farm, Manor Road	1.85	Residential	55												
NW22	Land At Manor Road	6.65	Residential	266												
NW23	Land Between Yarmouth Road and Field Lane	18.90	Residential	340												
NW24 & NW43	Land Adjacent Mushroom Farm, A149	4.55	Residential	120												
NW25	Land Off Laundry Loke	0.92	Residential	N/A	Previously Allocated and site is subject to planning permission. Discounted from further consideration.											
NW26	Land Adjacent Scarborough Hill House Hotel	1.41	Residential	60												
NW28/1 (Forms Part of NW62/A)	Land at Greens Road	6.50	Residential	200												
NW28/2 (Forms Part of NW62/A)	Land At Greens Road	10.64	Residential	319												
NW28a	North Walsham Football Club	5.07	Residential	80												

Site Ref	Site Name	Site Size (ha)	Proposed Use	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Sites
NW30 (Forms Part of NW01/B)	Ladbroke Engineering, Norwich Road	1.34	Residential	54												
NW31	Land Rear of East Coast Plastics	0.65	Mixed use	16												
NW34	Land at Spa Common	1.41	Residential	42												
NW36	Land at Little London Road	1.56	Residential	46												
NW40	Adjacent Holmfield, Little London	0.50	Residential	20												
NW41 (Forms Part of NW62/A)	Tungate Farm, Aylsham Road	42.53	Residential	1200												
NW42	Land Adjacent Happsburgh Road	1.17	Residential	47												
NW44	Paston College Lawns Site	1.47	Residential	N/A	Site was previously allocated, however, the site is no longer available. Discounted from further consideration.											
NW46	Land at Fernbank, West of Bacton Road	1.36	Residential	40												
NW47	Land Adjacent Royston Cottage, Little London	0.70	Residential	21												
NW48	Land North of Royston Cottage, Little London	0.62	Residential	18												
NW49	Land at 22 Skeyton Road	0.55	Residential	6												

Site Ref	Site Name	Site Size (ha)	Proposed Use	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Uses
NW50	Land South of Anchor Road	2.33	Residential	69												
NW51	Land at Southcroft, Yarmouth Road	0.92	Residential	27												
NW52	Land East of Bradfield Road	2.63	Employment	N/A												
NW54	Land West of Manor Road	9.948 4	Residential	300												
NW55	Land Between Manor Road & Happisburgh Rd	2.961	Residential	90												
NW56 (Forms Part of NW62/A)	Land at Bradfield Road	0.367	Residential	15												
NW57 (Forms Part of NW62/A)	Land At Greens Road	2.07	Residential	62												
NW58 (Forms Part of NW62/A)	Land South Cromer Road	20.12	Residential	600												
NW59 (Forms Part of NW62/A)	Land West Of Bradfield Road	4.08	Residential	163												
NW60	Land Between Lyngate Road And The Street	16.93	Residential	677												
NW61	Wayside Farm, Skeyton Road	12.05	Mixed Use	482												

Site Ref	Site Name	Site Size (ha)	Proposed Use	Proposed Dwellings	Connectivity	Safe achievable access	Impact on utilities infrastructure (Hazards)	Utilities Capacity	Contamination and ground stability	Flood Risk	Landscape Impact	Townscape	Biodiversity and Geodiversity	Historic Environment	Loss of beneficial use	Compatibility with Neighbouring/Adjoining Uses
NW62	Western Extension	95.00	Mixed Use	1800												
NW62/A	Western Extension	108.31	Mixed Use	1800												

DRAFT

2.2. Sustainability Appraisal Conclusions (Regulation 19)

Residential Sites

Site Ref	Conclusion (Residential Sites)
ED1	<p>Overall the site scores as positive</p> <p>Environmental – Scores positively; within settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential for remediation of contamination. Potential negative biodiversity impact; close proximity CWS, playing fields, surrounded by mature trees / hedgerow with area of mature trees & bushes (north east). Localised potential to contribute to and / or impact on GI network. No loss of agricultural (1-3) land.</p> <p>Social – Scores mixed; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Would result in loss of designated open land area.</p> <p>Economic – Scores positively; within settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW01/A	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; within settlement, part PDL, FZ1, low susceptibility GWF, an insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential for remediation of contamination. Biodiversity impact uncertain; part PDL, part mown / rough grass, part cultivated, mature trees / hedgerow around and within boundary (TPO alongside access). Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; within settlement, good access to employment (but loss of businesses), educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW01/B	<p>Overall the site scores as positive</p> <p>The consultation comments/ objections are noted. They do not alter the scoring for any of the SA objectives.</p> <p>Environmental – Scores mixed; edge of settlement, part PDL, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential for remediation of contamination. Biodiversity impact uncertain; part PDL / part arable, part mown / rough grass, part cultivated, mature trees / hedgerow around and within boundary (TPO alongside access). Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (but loss of businesses), educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW05	<p>Overall the site scores as positive</p> <p>Environmental – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Biodiversity impact uncertain; rough grass land, part cultivated, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW06/1	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building</p>

Site Ref	Conclusion (Residential Sites)
	<p>(Monument Cottage) & Scheduled Ancient Monument / Grade II Listed Cross (site of battle). Biodiversity impact uncertain; arable land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Could provide significant public open space.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW07	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, part PDL, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Biodiversity impact uncertain; part PDL, part grass / cultivated, mature trees / hedgerow around and within boundary (TPO alongside access). Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (but loss of undesignated employment land), educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW08	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; remote location, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building (Monument Cottage), Scheduled Ancient Monument / Grade II Listed Standing Cross (site of battle) & Scheduled Ancient Monument (Cross). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Limited potential for remediation of contamination. Could impact on safeguarded mineral resources. Potential negative biodiversity impact; close proximity CWS (Lord Anson's Wood), SSSI (Westwick Lakes), arable, mature trees / hedgerow, around and within site, adjacent woodland. Localised potential to contribute to and / or impact on GI network. Part loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; remote location, services in adjacent settlement (some within 2km of site). Could provide significant public open space.</p> <p>Economic – Scores mixed; remote location, likely to rely on car to access employment, educational facilities and services / facilities and town centre (adjacent settlement). Access to high speed broadband uncertain. Likely to rely on car.</p>
NW08/1	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores negatively; edge of settlement, extends into open countryside, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential negative biodiversity impact; close proximity CWS (Weavers way), arable, mature trees / hedgerow to majority of boundary. Localised potential to contribute to GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW08/2	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Could provide significant public open space.</p>

Site Ref	Conclusion (Residential Sites)
	Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.
NW09	Overall the site scores as positive Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; close proximity CWS (Weavers Way) rough grass / scrub, many mature trees to boundary. Loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.
NW11	Overall the site scores as positive Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; adjacent CWS (Weavers Way), arable, mature trees / hedgerow to parts of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.
NW14/53	Overall the site scores as positive Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential for remediation of contamination. Biodiversity impact uncertain; green field land (possibly grazing), scrub, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment (some potential loss of small area of vacant designated employment land), services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.
NW15	Overall the site scores as positive Environmental – Scores mixed; edge of settlement, FZ1, low / moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Could impact on allocated waste site. Biodiversity impact uncertain; arable land, mature hedgerow / trees around and within site. Localised potential to contribute to and / or impact on GI network. Part loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.
NW15/1	Overall the site scores as positive Environmental – Scores neutral; edge of settlement, FZ1, low / moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Could impact on allocated waste site. Biodiversity impact uncertain; arable land, mature hedgerow / trees to majority of boundaries. Localised potential to contribute to and / or impact on GI network. Part loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.
NW15/2	Overall the site scores as positive

Site Ref	Conclusion (Residential Sites)
	<p>Environmental – Scores neutral; edge of settlement, FZ1, low / moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Biodiversity impact uncertain; arable land, with mature hedgerow / trees to majority of boundaries. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW16	<p>Overall the site scores as negative and positive</p> <p>The consultation comments/ objections are noted. They do not alter the scoring for any of the SA objectives.</p> <p>Environmental – Scores negatively; edge of settlement, FZ1, low / low to moderate susceptibility GWF, small area potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building (The Thatched Cottage). Potential negative biodiversity impact; immediately adjacent CWS (Paston Way & Knapton Cutting), arable, mature trees / hedgerow to majority of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW16/1	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores negatively; edge of settlement, FZ1, low / low to moderate susceptibility GWF, small area potentially susceptible to SWF (CC). Potential negative biodiversity impact; part adjacent CWS (Paston Way & Knapton Cutting), arable, mature trees / hedgerow around part of site. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW17	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; loosely related to settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Alder Carr), green field land (possibly grazing), heavily treed boundary. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; loosely related to settlement, good access to local healthcare service, education facilities, access to peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; loosely related to settlement, good access to employment, educational facilities, access to transport links, services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
NW18/1	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; loosely related to settlement, low to moderate susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential to affect setting of Grade II Listed Building (Melbourne House). Potential negative biodiversity impact; close proximity CWSs (Alder Carr, Spa Common), green field land (possibly grazing), small woodland, mature hedgerow / trees to majority of boundaries. Would utilise mostly non-agricultural grade land.</p> <p>Social – Scores positively; loosely related to settlement, good access to local healthcare service, education facilities, access to peak time public transport links, leisure and cultural opportunities.</p>

Site Ref	Conclusion (Residential Sites)
	<p>Economic – Scores positively; loosely related to settlement, good access to employment, educational facilities, access to transport links, services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
<p>NW19</p> <p>NW20 & NW33</p>	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores negatively; edge of settlement, FZ1, low to moderate susceptibility GWF, approximately one third of site potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building (Melbourne House). Potential negative biodiversity impact; adjacent CWS (Alder Carr), close proximity CWS (Spa Common), part PDL, caravan / chalet park, mature trees around & within site (subject to TPOs). Some loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, access to peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (but loss of business), educational facilities, access to transport links, services / facilities. High speed broadband in vicinity. Town centre easily accessible from the site.</p> <p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low to moderate susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; close proximity CWSs (Alder Carr, Spa Common), arable land, mature hedgerow / trees around and within site. Localised potential to contribute to and / or impact on GI network. Part loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW21</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low to moderate susceptibility GWF, small area potentially susceptible to SWF (CC). Potential negative biodiversity impact; close proximity CWS (Spa Common), arable / grazing land, mature hedgerow / trees to majority of boundaries. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, access to peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to educational facilities, services / facilities, access to employment, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
<p>NW22</p>	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; edge of settlement, extends into open countryside, FZ1, low susceptibility GWF, small areas potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Limited potential for remediation of contamination. Potential negative biodiversity impact; part arable, part woodland (subject to TPO), part adjacent woodland. Loss of mostly agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to education facilities, peak time public transport links and access to local healthcare service, leisure and cultural opportunities.</p> <p>Economic – Scores neutral; edge of settlement, good access to educational facilities, services / facilities, access to employment, transport links. Access to high speed broadband uncertain. Town centre easily accessible from the site. Likely to rely on car.</p>
<p>NW23</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential for remediation of contamination. Biodiversity impact uncertain; arable, grass / trees to boundaries, small woodland adjacent north east corner. Localised potential to contribute to and / or impact on GI network. Loss of mostly agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p>

Site Ref	Conclusion (Residential Sites)
	<p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW24 & NW43</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Biodiversity impact uncertain; arable land, mature hedgerow / trees around and within site, adjacent small woodland. Loss of mostly agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW25</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores positively; within settlement, part PDL, FZ1, low susceptibility GWF, approximately one third of site potentially susceptible to SWF (CC). Potential for remediation of contamination. Potential for enhancement of townscape. Biodiversity impact uncertain; part PDL (demolished factory) overgrown land, mature trees / shrubs to approximately half of site. No loss of agricultural (1-3) land.</p> <p>Social – Scores positively; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; within settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW26</p>	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; remote from settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees, tree belt to north east boundary and adjacent south east corner. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; remote from settlement, services in adjacent settlement (some within 2km of site).</p> <p>Economic – Scores mixed; remote from settlement, likely to rely on car to access employment, educational facilities and services / facilities and town centre (adjacent settlement). Access to high speed broadband uncertain. Likely to rely on car.</p>
<p>NW28/1</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential negative biodiversity impact; close proximity CWS (Weavers Way), arable, mature trees / hedgerow to parts of boundary. Localised potential to contribute to and / or impact on GI network. Loss of mostly agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW28/2</p>	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores negatively; edge of settlement, extends into open countryside, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; immediately adjacent CWS (Weavers Way), arable, mature trees / hedgerow part boundary, grass verge / drainage ditch. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p>

Site Ref	Conclusion (Residential Sites)
	<p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW28a	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores mixed; edge of settlement, small area PDL, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Potential negative biodiversity impact; close proximity CWS (Weavers Way), sports pitches, surrounded by mature hedgerow / trees, close proximity pond. Localised potential to contribute to and / or impact on GI network. Some loss of agricultural (1-3) land.</p> <p>Social – Scores mixed; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Would result in loss of open land area (sports pitches).</p> <p>Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW30	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; within settlement, part PDL, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential for remediation of contamination. Biodiversity impact uncertain; part PDL, part mown / rough grass, mature trees / hedgerow to boundary. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; within settlement, good access to employment (but loss of business), educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW31	<p>Overall the site scores as positive</p> <p>Environmental – Scores positively; within settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential for remediation of contamination. Limited biodiversity potential; mown grass, concrete access and fencing to boundary. No loss of agricultural (1-3) land.</p> <p>Social – Scores positively; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; within settlement, good access to employment (but loss of designated employment land (un-used)), educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
NW34	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; loosely related to settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWSs (Alder Carr, Spa Common), grazing land, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; loosely related to settlement, good access to local healthcare service, education facilities, peak time public transport links, access to leisure and cultural opportunities.</p> <p>Economic – Scores positively; loosely related to settlement, good access to employment, educational facilities, transport links, access to services / facilities. High speed broadband in vicinity. Town centre accessible from the site. Likely to rely on car.</p>
NW36	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; removed from settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Paston way and Knaption Cutting), grazing land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site).</p>

Site Ref	Conclusion (Residential Sites)
	Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities and services / facilities and town centre (adjacent settlement). High speed broadband in vicinity. Likely to rely on car.
NW40	Overall the site scores as negative Environmental – Scores negatively; removed from settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWSs (Alder Carr, Spa Common), grazing, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land. Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site). Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities and services / facilities and town centre (adjacent settlement). High speed broadband in vicinity. Likely to rely on car.
NW41	Overall the site scores as negative and positive Environmental – Scores negatively; edge of settlement but more rural; FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential to affect setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns). Limited potential for remediation of contamination. Potential negative biodiversity impact; close proximity CWS (Weavers Way), arable, surrounded by mix of grass verges, mature trees / hedgerow, adjacent pond. Loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, services / facilities, transport links, access to educational facilities. High speed broadband in vicinity. Town centre easily accessible from the site.
NW42	Overall the site scores as positive Environmental – Scores neutral; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Biodiversity impact uncertain; grazing land surrounded by mature trees / shrubs, adjacent small woodland. Loss of mostly agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.
NW44	Overall the site scores as positive Environmental – Scores mixed; within settlement, mostly PDL, FZ1, low susceptibility GWF, approximately one third of site potentially susceptible to SWF (CC). Potential to affect settings of CA, Grade II* Listed Building (No.15 Ivy Cottage, Aylsham Road), Grade II Listed Buildings (outbuilding south of No.15, garden walls of No.15, former girls' high school (Market Street), front wall of former girls' high school, No's. 3, 5, 7 & 9 (Market Street)). Limited biodiversity potential; PDL, group of mature trees. No loss of agricultural (1-3) land. Social – Scores positively; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; within settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.
NW46	Overall the site scores as negative and positive Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential significant detrimental impact on landscape (loss of trees). Localised potential to contribute to and / or impact on GI network. Biodiversity impact uncertain; grazing /garden land, mature hedgerow / trees around and within site. Loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to education facilities, access to peak time public transport links, local healthcare service, leisure and cultural opportunities.

Site Ref	Conclusion (Residential Sites)
	Economic – Scores positively; edge of settlement, good access to employment, educational facilities, access to transport links, services / facilities. High speed broadband in vicinity. Town centre accessible from the site. Likely to rely on car.
NW47	Overall the site scores as negative Environmental – Scores negatively; removed from settlement, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Spa Common), grazing, mature hedgerow / trees around and within site. Loss of agricultural (1-3) land. Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site). Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities, services / facilities and town centre (adjacent settlement). High speed broadband in vicinity.
NW48	Overall the site scores as negative Environmental – Scores negatively; removed from settlement, part within FZ2, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Spa Common), rough grass, mature trees around and within site. Loss of agricultural (1-3) land. Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site). Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities, services / facilities and town centre (adjacent settlement). High speed broadband in vicinity.
NW49	Overall the site scores as negative and positive Environmental – Scores mixed; edge of settlement, part PDL, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential negative biodiversity impact; adjacent CWS (Weavers way), arable / grazing / garden, mature trees / hedgerow surrounding, adjacent copse. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land. Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; edge of settlement, good access to employment, educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site.
NW50	Overall the site scores as negative and positive Environmental – Scores negatively; loosely related to settlement, FZ1, low to moderate susceptibility GWF, approximately one third of site potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWSs (Alder Carr, Spa Common), grazing, mature hedgerow / trees around and within site. Loss of agricultural (1-3) land. Social – Scores positively; loosely related to settlement, good access to education facilities, access to local healthcare service, peak time public transport links, leisure and cultural opportunities. Economic – Scores positively; loosely related to settlement, good access to educational facilities, access to employment, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.
NW51	Overall the site scores as negative Environmental – Scores negatively; removed from settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape (loss of trees). Potential negative biodiversity impact; woodland. Loss of agricultural (1-3) land. Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site).

Site Ref	Conclusion (Residential Sites)
	<p>Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities, services / facilities and town centre (adjacent settlement). High speed broadband in vicinity.</p>
NW52	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; edge of settlement (adjacent to implemented employment allocation), FZ1, moderate to high susceptibility GWF, small area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely detrimental impact on landscape. Potential for remediation of contamination. Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site).</p> <p>Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities, services / facilities and town centre (adjacent settlement). High speed broadband in vicinity.</p>
NW54	<p>Overall the site scores as negative</p> <p>Environmental – Scores mixed; removed from settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Biodiversity impact uncertain; arable, surrounded by grass verges / mature trees / hedgerow, adjacent small woodland (subject to TPO). Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site).</p> <p>Economic – Scores mixed; removed from settlement, likely to rely on car to access employment, educational facilities, services / facilities and town centre (adjacent settlement). Access to high speed broadband uncertain.</p>
NW55	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; remote from settlement, FZ1, low to moderate susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Biodiversity impact uncertain; arable, surrounded by grass verges, some mature trees / hedgerow, close proximity small woodland. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; remote from settlement, services in adjacent settlement (some within 2km of site).</p> <p>Economic – Scores negatively; remote from settlement, likely to result in reliance on car to access facilities. High speed broadband in vicinity.</p>
NW56	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, small area potentially susceptible to SWF (CC). Biodiversity impact uncertain; green field land (possibly grazing), surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Limited scope for open space provision.</p> <p>Economic – Scores neutral; edge of settlement, good access to employment, access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
NW57	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; removed from settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; adjacent CWS (Weavers way), arable, grass verges, mature trees to parts of boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site).</p> <p>Economic – Scores negatively; removed from settlement, likely to result in reliance on car to access facilities. High speed broadband in vicinity.</p>
NW58	<p>Overall the site scores as negative and positive</p>

Site Ref	Conclusion (Residential Sites)
	<p>Environmental – Scores negatively; loosely related to settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Part removed from built environment; potential to increase light pollution, likely detrimental impact on landscape. Potential to affect setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns). Biodiversity impact uncertain; arable, surrounded by grass verges / scrub / mature hedgerow / trees, pond adjacent. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; loosely related to settlement, good access to local healthcare service, access to education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores neutral; loosely related to settlement, good access to employment, access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
NW59	<p>Overall the site scores as neutral</p> <p>Environmental – Scores neutral; within settlement, part PDL, FZ1, moderate to high susceptibility GWF, not considered at risk of SWF (CC). Potential for remediation of contamination. Biodiversity impact uncertain; outside storage, grass, mature trees to part boundary. Loss of agricultural (1-3) land.</p> <p>Social – Scores positive; within settlement but removed from residential areas, good access to local healthcare service, access to education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores mixed; within settlement, good access to employment (but loss of designated employment land), access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
NW60	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores negative; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect settings of Grade II Listed Building (The Thatched Cottage) & Grade II* (Friends Meeting House). Potential negative biodiversity impact; close proximity CWS (Paston Way & Knapton Cutting), arable land, mature hedgerow / trees around and within parts of site. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, access to education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
NW61	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; remote from settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Rural; potential to increase light pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Weavers way), arable, grass, verges / some trees to boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; remote from settlement, services in adjacent settlement (some within 2km of site).</p> <p>Economic – Scores negatively; remote from settlement, likely to result in reliance on car to access facilities. Access to high speed broadband uncertain.</p>
NW62	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, majority of area low susceptibility GWF, part within moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to impact setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns) and Scheduled Ancient Monument & Grade II Listed Cross (Stump Cross). Scale of site; potential to increase light pollution, potential for significant detrimental landscape impact but potential for significant landscaping mitigation and cohesive design / master planning. Potential for remediation of contamination. Potential negative biodiversity impact; parts of site within close proximity / adjacent CWS (Weavers Way), majority of site arable, mature trees / hedgerow to boundaries (& within site), scrub, grassland and close</p>

Site Ref	Conclusion (Residential Sites)
	<p>proximity small woodland and pond. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, majority of the site has good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. In addition, the scale of the site would potentially enable, through masterplanning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (some potential loss of small area of designated employment land), access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. In addition, the scale of the site would potentially enable, through masterplanning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p>

Employment Sites

Site Ref	Conclusion (Employment Sites)
E10	<p>Overall the site scores as positive</p> <p>The consultation comments/objections are noted. They do not alter the SA assessment for the site.</p> <p>Environmental – Scores positively; edge of settlement, FZ1, low / moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Could impact on allocated waste sites. Potential for remediation of contamination. Biodiversity impact uncertain; arable land, mature hedgerow / trees around and within site. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement.</p> <p>Economic – Scores positively; edge of settlement, potential to provide a range of employment opportunities, good access to potential employees and transport links. High speed broadband in vicinity.</p>
NW01/A	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; within settlement, part PDL, FZ1, low susceptibility GWF and an insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential for remediation of contamination. Biodiversity impact uncertain; part PDL, part mown / rough grass, part cultivated, mature trees / hedgerow around and within boundary (TPO alongside access). Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; within settlement.</p> <p>Economic – Scores positively; within settlement, potential to provide a range of employment opportunities, good access to potential employees and transport links. High speed broadband in vicinity.</p>
NW06/1	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential detrimental impact on landscape. Potential to affect setting of Grade II Listed Building (Monument Cottage) & Scheduled Ancient Monument / Grade II Listed Cross (site of battle). Biodiversity impact uncertain; arable land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement.</p>

	<p>Economic – Scores positively; edge of settlement, potential to provide a range of employment opportunities, good access to potential employees and transport links. High speed broadband in vicinity.</p>
NW15	<p>Overall the site scores as negative and positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low / moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Could impact on allocated waste site. Biodiversity impact uncertain; arable land, mature hedgerow / trees around and within site. Localised potential to contribute to and / or impact on GI network. Part loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement.</p> <p>Economic – Scores positively; edge of settlement, potential to provide a range of employment opportunities, good access to potential employees and transport links. High speed broadband in vicinity.</p>
NW52	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; edge of settlement (adjacent to implemented employment allocation), FZ1, moderate to high susceptibility GWF, small area potentially susceptible to SWF (CC). Rural; potential to increase light / noise / odour pollution, likely significant detrimental impact on landscape. Potential for remediation of contamination. Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; removed from settlement.</p> <p>Economic – Scores mixed; removed from settlement, potential to provide a range of employment opportunities, access to potential employees, poor transport links. High speed broadband in vicinity. Likely to result in reliance on the car.</p>
NW61	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; remote from settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Rural; potential to increase light / noise / odour pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Weavers way), arable, grass, verges / some trees to boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; remote from settlement.</p> <p>Economic – Scores negatively; remote from settlement (adjacent to implemented employment allocation), potential to provide a range of employment opportunities, access to potential employees, poor transport links. Access to high speed broadband uncertain. Likely to result in reliance on the car.</p>

Mixed Use Sites

Site Ref	Conclusion (Mixed Use Sites)
<p>NW01/A (comprises of NW05, NW07 & NW30) housing & employment</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; within settlement, part PDL, FZ1, low susceptibility GWF and an insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential for remediation of contamination. Biodiversity impact uncertain; part PDL, part mown / rough grass, part cultivated, mature trees / hedgerow around and within boundary (TPO alongside access). Loss of agricultural (1-3) land.</p>

	<p>Social – Scores positively; within settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Potential to provide new services.</p> <p>Economic – Scores positively; within settlement, good access to employment (but potential loss of existing businesses), potential employees, educational facilities, services / facilities, transport links. Potential to accommodate a range of uses. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW01/B (comprises of NW05, NW06/1 (part), NW07 & NW30)</p>	<p>Overall the site scores as positive</p> <p>The consultation comments/ objections are noted. They do not alter the scoring for any of the SA objectives.</p> <p>Environmental – Scores mixed; edge of settlement, part PDL, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Scheduled Ancient Monument / Grade II Listed Cross (Stump Cross). Potential for remediation of contamination. Biodiversity impact uncertain; part PDL / part arable, part mown / rough grass, part cultivated, mature trees / hedgerow around and within boundary (TPO alongside access). Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Potential to provide new services.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, potential employees, educational facilities, services / facilities, transport links. Potential to accommodate a range of uses and to improve existing employment opportunities. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW06/1 Housing & Employment</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to affect setting of Grade II Listed Building (Monument Cottage) & Scheduled Ancient Monument / Grade II Listed Cross (site of battle). Biodiversity impact uncertain; arable land, part of boundary comprised of mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Could provide significant public open space. Potential to provide new services.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, potential employees, services / facilities, transport links, access to educational facilities. Potential to accommodate a range of uses. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW14/53 Housing, Storage, Distribution</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low susceptibility GWF, not considered at risk of SWF (CC). Potential for remediation of contamination. Biodiversity impact uncertain; green field land (possibly grazing), scrub, surrounded by mature hedgerow / trees. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (some potential loss of small area of designated employment land), potential employees, services / facilities, transport links, access to educational facilities. Potential to accommodate mixed use. High speed broadband in vicinity. Town centre easily accessible from the site.</p>

<p>NW15 Housing & Employment</p>	<p>Overall the site scores as positive</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, low / moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Could impact on allocated waste site. Biodiversity impact uncertain; arable land, mature hedgerow / trees around and within site. Localised potential to contribute to and / or impact on GI network. Part loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. Potential to provide new services.</p> <p>Economic – Scores positively; edge of settlement, good access to employment, potential employees, services / facilities and transport links. Potential to accommodate a range of uses. High speed broadband in vicinity. Town centre easily accessible from the site.</p>
<p>NW52 Mixed</p>	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; edge of settlement, FZ1, moderate to high susceptibility GWF, small area potentially susceptible to SWF (CC). Rural; potential to increase light / noise / odour pollution, likely significant detrimental impact on landscape. Potential for remediation of contamination. Biodiversity impact uncertain; arable land, surrounded by mature hedgerow / trees. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; removed from settlement, services in adjacent settlement (some within 2km of site). Potential to provide new services.</p> <p>Economic – Scores mixed; removed from settlement, access to potential employees, poor transport links. Potential to accommodate a range of uses. High speed broadband in vicinity. Likely to result in reliance on the car.</p>
<p>NW59 Housing & Employment</p>	<p>Overall the site scores as neutral</p> <p>Environmental – Scores neutral; within settlement, part PDL, FZ1, moderate to high susceptibility GWF, not considered at risk of SWF (CC). Potential for remediation of contamination. Biodiversity impact uncertain; outside storage, grass, mature trees to part boundary. Loss of agricultural (1-3) land.</p> <p>Social – Scores positive; within settlement but removed from residential areas, good access to local healthcare service, access to education facilities, peak time public transport links, leisure and cultural opportunities. Potential to provide new services.</p> <p>Economic – Scores mixed; within settlement, good access to employment (but some loss of designated employment land), potential employees, access to educational facilities, services / facilities, transport links. Potential to accommodate a range of uses. High speed broadband in vicinity. Town centre easily accessible from the site. Likely to rely on car.</p>
<p>NW61 Housing & Employment</p>	<p>Overall the site scores as negative</p> <p>Environmental – Scores negatively; remote from settlement, FZ1, low susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Rural; potential to increase light / noise / odour pollution, likely significant detrimental impact on landscape. Potential negative biodiversity impact; close proximity CWS (Weavers way), arable, grass, verges / some trees to boundary. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores negatively; remote from settlement, services in adjacent settlement (some within 2km of site). Potential to provide new services.</p> <p>Economic – Scores negatively; remote from settlement, access to potential employees, poor transport links. Potential to accommodate a range of uses. Access to high speed broadband uncertain. Likely to result in reliance on the car.</p>

<p>NW62 (Comprises of reduced NW08/2, reduced NW08/1, NW11, NW57, NW28/1, NW28/2, NW41, reduced NW58, NW14/53, NW56 & NW59) housing, employment, education, open space</p>	<p>Overall the site scores as positive The consultation comments/ objections are noted. They do not alter the scoring for any of the SA objectives.</p> <p>Environmental – Scores mixed; edge of settlement, FZ1, majority of area low susceptibility GWF, part within moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to impact setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns) and Scheduled Ancient Monument & Grade II Listed Cross (Stump Cross. Scale of site; potential to increase light pollution, potential for significant detrimental landscape impact but potential for significant landscaping mitigation and cohesive design / master planning. Potential for remediation of contamination. Potential negative biodiversity impact; parts of site within close proximity / adjacent CWS (Weavers Way), majority of site arable, mature trees / hedgerow to boundaries (& within site), scrub, grassland and close proximity small woodland and pond. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, majority of the site has good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. In addition, the scale of the site would potentially enable, through master planning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (some potential loss of small area of designated employment land), access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. In addition, the scale of the site would potentially enable, through master planning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p>
<p>NW62/A (comprises new area of land at northern end plus NW15/2, NW56, NW14/53, NW59, NW41, NW28/1, NW28/2, NW57, NW11, NW08/1, NW08/2)</p>	<p>Overall the site scores as positive Environmental – Scores mixed; edge of settlement, FZ1, majority of area low susceptibility GWF, part within moderate to high susceptibility GWF, insignificant area potentially susceptible to SWF (CC). Potential to impact setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns). Scale of site; potential to increase light pollution, potential for significant detrimental landscape impact but potential for significant landscaping mitigation and cohesive design / master planning. Potential for remediation of contamination. Potential negative biodiversity impact; CWS (Weavers Way) crosses through the middle section of the site. Majority of site arable, mature trees / hedgerow to boundaries (& within site), scrub, grassland and close proximity small woodland and pond. Localised potential to contribute to and / or impact on GI network. Loss of agricultural (1-3) land.</p> <p>Social – Scores positively; edge of settlement, majority of the site has good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. In addition, the scale of the site would potentially enable, through masterplanning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p> <p>Economic – Scores positively; edge of settlement, good access to employment (some potential loss of small area of designated employment land), access to educational facilities, services / facilities, transport links. High speed broadband in vicinity. Town centre easily accessible from the site. In addition, the scale of the site would potentially enable, through masterplanning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p>

2.3. Planning History

NW01 – Land at Norwich Road/Nursery Drive: previously allocated site (NW01) for approximately 400 dwellings and 5 hectares of employment land. 2 sites have been independently developed as part of the allocation: Hopkins Homes delivering approximately 176 dwellings and an area of employment land on the northern part of the allocation; and, Persimmon Homes delivering approximately 100 dwellings to the south. Part of this allocation is still outstanding around 120 dwellings and 2ha of employment land.

NW14/53 – Links Road/Bradfield Road: two planning application have been considered for the site. Both applications were for mixed use development. **Application PF/17/2197** was for 71 dwellings and area for commercial development and was **refused in March 2018**. **Application PF/19/0827** was for 66 dwellings and an area for commercial development and was **refused in Sept. 2019**. This site now forms part of the proposed Western Extension allocation.

NW28/1 – Greens Road: A planning application **PO/17/0549 for 200 dwellings was refused** and an appeal dismissed in 2018. This site now forms part of the proposed NW62/A Western Extension allocation.

DRAFT

2.4. Site Assessment

This section draws together the Site Assessment and Sustainability Appraisal processes, the results of the Regulation 18 stage consultation and the various evidence documents to make a recommendation as to whether each site is considered suitable for retention in the next stage of plan preparation, or if no further consideration should be given.

Site Ref	Assessment
ED1	<p>Playing Field, Station Road</p> <p>SA Conclusion: The site scores as positive. The Environmental objectives score positively being edge of settlement, within Flood Zone 1, where there is a potential negative biodiversity impact being in close proximity to a CWS and being a playing field surrounded by mature trees / hedgerow with an area of mature trees and bushes (north east). The Social objectives score mixed and the Economic objectives score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, but development of the site would result in the loss of a designated open land area.</p> <p>Connectivity: The site has excellent connectivity and all catchment schools are within walking distance. The town centre is within walking and cycling distance and the town has a range of employment, shopping and leisure opportunities.</p> <p>North Walsham offers sustainable transport options with regular bus and rail services available to a number of destinations including Sheringham, Cromer and Norwich. Rail services to Norwich take 30mins are every hour. The bus stops are located within 250m of the site.</p> <p>Highways: Highway access is possible to be achieved off Station Road, however, the Highway Authority have concerns over the increase in vehicular movement through the Station Road / Norwich Road junction. The junction is subject to severely sub-standard visibility in the critical direction to the south east.</p> <p>Environmental: The site is a large mown grass recreational field. On the eastern side of the site is a small woodland with hedges and trees along the southern, western and northern boundaries. There are no other environmental features on the site. To the north is a footpath and to the north east is the railway. To the west and south is residential development at Station Road and Oak Road.</p> <p>HRA (where relevant) N/A</p> <p>Landscape and Townscape: The site is a large open area in the south western part of town. The site, together with the open space around the leisure centre provide a feeling of openness along Station Road which provides a rare verdant visual amenity and provides a unique character for this area of North Walsham. Although there is no public access into the site, although there is a footway on Station Road and a public footpath to the north which offer views across into the site. Residential development on the site would change the character of the area and diminish the views available across the site.</p> <p>Other: The whole site is within Flood Zone 1 and there is a small area that may be at risk of surface water flooding. There are no heritage assets on the site or in the vicinity.</p>

Conclusion:

This is a large designated open space site in the centre of town. The site is not considered suitable for residential development as it would result in the loss of an open space which is considered important for its visual amenity value. The site is not considered to be suitable for development.

The allocation of the site for the Paston College Relocation (Policy ED1) will not be carried forward.

Recommendation:

That this site is discounted from further consideration.

NW01/B

Land at Norwich Road & Nursery Drive

SA Conclusion:

The site scores as **positive**. The Environmental objectives score mixed being edge of settlement, partly Previously Developed Land and within Flood Zone 1. There is the potential to affect the setting of a Scheduled Monument / Grade II Listed Cross (Stump Cross) and the biodiversity impact is uncertain. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.

Connectivity:

The site has excellent connectivity and all catchment schools are within walking distance. The town centre is within walking and cycling distance and the town has a range of employment, shopping and leisure opportunities.

North Walsham offers sustainable transport options with regular bus and rail services available to a number of destinations including Sheringham, Cromer and Norwich. Rail services to Norwich take 30mins are every hour. The bus stops are located within 500m of the site.

Highways:

Suitable highways access can be achieved off the Norwich Road. The development must have at least two points of vehicular access. The development should incorporate links (including pedestrian and cycling) to the sites located to the north (Hopkins Homes) and south (Persimmon Homes). The development should not permit additional vehicular access via Nursery Lane. Congestion at the B1150/A149 traffic signal junction is a known problem.

Environmental:

The site is currently in a number of land use including industrial premises, a garden centre, redundant nursery and greenhouses and to the SE a large arable field. There are a number of established hedgerows and trees throughout the site. The land around the industrial and commercial uses may be contaminated and that may require remediation.

HRA (where relevant)

N/A

Landscape and Townscape:

The site is located behind existing development along Norwich Road and is well related to the built area of North Walsham. The area is generally screened from view by existing development, although, the SE of the site can be glimpsed from the North Walsham Road and is visible from the railway.

Other:

The site is in Flood Risk Zone 1 and has a small area of the NW corner of the site that may be susceptible to surface water flooding.

Site Ref	Assessment
	<p>Conclusion:</p> <p>The site is available and if allocated there is no evidence to suggest that development is undeliverable.</p> <p>Part of the site is already allocated for residential development in the current adopted Plan. The site is well located in relation to the town centre and services. There are no significant environmental constraints and the site is well contained in the landscape. The site scores positively in the Sustainability Appraisal. It is a combined site which includes sites: NW05, NW06/1, NW07 & NW30</p> <p>Recommendation:</p> <p>That this site is identified as a Proposed Allocation subject to the detailed policy requirements and no new substantive issues being identified in the HRA and/or Heritage Impact Assessment.</p>
NW08	<p>Land To The South Of North Walsham</p> <p>SA Conclusion:</p> <p>The site scores as negative. The Environmental objectives score is negative, having a remote location, within Flood Zone 1, where there is potential to affect the setting of a Grade II Listed Building (Monument Cottage), Scheduled Monument / Grade II Listed Standing Cross (site of battle) & Scheduled Monument (Cross), a likely significant detrimental impact on landscape and potential negative biodiversity impact being in close proximity to CWS (Lord Anson's Wood), SSSI (Westwick Lakes). Development of the site could also impact on safeguarded mineral resources. The Social objectives score negatively and Economic objectives score is mixed, as services are found in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and town centre (adjacent settlement). The site could provide significant public open space.</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW15	<p>Land At Bradfield Road</p> <p>SA Conclusion:</p> <p>The site scores as positive. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1. There could be an impact on an allocated waste site and the biodiversity impact is uncertain being arable land with mature hedgerow / trees around and within the site. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion:</p> <p>This is a large site that is reasonably remote and detached from the main town although it is well located to the employment area. Highways access and the local network are considered to be</p>

Site Ref	Assessment
	<p>unsuitable. The whole site is not considered to be suitable for development, however, a small parcel is suitable. That parcel has been renumbered NW15/2 and is assessed above.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW15/1	<p>Land At Bradfield Road</p> <p>SA Conclusion:</p> <p>The site scores as positive. The Environmental objectives score is neutral being edge of settlement, within Flood Zone 1. There could be an impact on an allocated waste site and the biodiversity impact is uncertain being arable land with mature hedgerow / trees around and within the site. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion:</p> <p>This site is a reduced part of NW15. The site is reasonably remote and detached from the main town although it is well located to the employment area. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development and would not bring forward the benefits associated with NW15/2.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW15/2	<p>Land At Bradfield Road</p> <p>SA Conclusion:</p> <p>The site scores as positive. The Environmental objectives score is neutral being edge of settlement, within Flood Zone 1. There could be an impact on an allocated waste site and the biodiversity impact is uncertain being arable land with mature hedgerow / trees around and within the site. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Connectivity:</p> <p>The catchment schools are within acceptable walking distance. North Walsham has good public transport links with both bus and rail being available. The site location corresponds well with an employment area.</p> <p>Highways:</p> <p>Access is available via Bradfield Road. However, Bradfield Road is considered by the Highway Authority to not to be of a standard that would be able to accommodate development traffic. To the south west Link Road is constrained by a rail bridge that limits forward visibility and restricts available width. Substantial highway improvement and 3rd party land would be required to make allocation acceptable to the Highway Authority. This site does offer the opportunity to provide land that could facilitate delivery of highway improvements to the rail bridge that would benefit access into the site and also improve access into the industrial estate which would offer significant strategic benefits for the town.</p> <p>Environmental:</p> <p>The site is a small rectangular arable field with hedge boundaries on all four sides. There are no</p>

	<p>other environmental features on the site. To the south east of the site is residential bungalow development along Bradfield Road. The south western side of the site is bounded by the railway line.</p> <p>HRA (where relevant) N/A</p> <p>Landscape and Townscape: This small site is not visible in the wider landscape and residential development would have limited impact on the landscape setting of the town with this part of town mainly consisting of modern bungalow development. Views into the site would change, however such views are currently only glimpses from the adjacent roads and are generally contained by trees and hedges.</p> <p>Other: The whole site is within Flood Zone 1 and there is a small area that may be at risk of surface water flooding. There are no formal environmental designations on the land. There are no heritage assets on the site or in the vicinity.</p> <p>Conclusion: The site is available, however, there are existing concerns from the Highway Authority regarding access to the site. However, the site does offer the opportunity to provide highway improvements along Bradfield Road and to the railway bridge that would be of wider strategic benefit. The delivery of such improvements would also enable the site to come forward for development of approximately 30 dwellings. In all other respects the site is an acceptable and benign location for residential development.</p> <p>Recommendation: That the site is discounted for individual allocation, however, the site should be included as part of an enlarged Western Extension Allocation (see NW62/A). Details for the site will be included in the policy requirements for the Western Extension and details on how development can be brought forward will be outlined within the Development Brief.</p>
--	--

NW16	<p>Land at End of Mundesley Road</p> <p>SA Conclusion: The site scores as negative and positive. The Environmental objectives score is negative being edge of settlement. There is potential to affect the setting of a Grade II Listed Building (The Thatched Cottage) and potential for a negative biodiversity impact being immediately adjacent to CWS (Paston Way & Knapton Cutting). The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Connectivity: The site has reasonable connectivity to the town centre and services. The catchment schools are within acceptable walking distance, however, the infants and junior schools are approximately 1.5km walking distance from the site which may be challenging for parents with younger children.</p> <p>North Walsham has good public transport links with both bus and rail being available, although the site is approximately 2km from the railway station. The site location corresponds well with an employment area. Pedestrian & cycle access to be provided to Wharton Drive, Acorn Road and Mundesley Road. Improvements required to the Paston Way trail and PROW FP11 with particular step free access to the both from the development and at Little London Road. Whilst the site is adjacent to a bus route, there are no existing stops and those would need to be provided.</p> <p>Highways: Two points of access are required to service 330 dwellings. Primary access to be via an on-line</p>
------	---

roundabout junction on the B1145. Secondary access to be via the existing highway network to the east and south of the site, detail to be confirmed in consultation with the Highway Authority. 3rd party land will be required to deliver the primary access. Improvements required to the Paston Way trail and PROW FP11 with particular reference to step free access both from the development and at Little London Road.

Further information (post Reg. 18) has been provided by the site promotor which shows a potential new highway connection, with a roundabout, to the B1145 which appears to be acceptable to the Highway Authority.

Environmental:

The site is a large agricultural field on the northern edge of town. The site gently slopes from south to north towards Little London Lane. To the south is the residential development at Swafield Rise/Mayfield Way. The western boundary of the site is the former railway embankment that is now the Paston Way (part of the Norfolk Trails network). The railway embankment is also a 'County Wildlife Site'.

HRA (where relevant)

N/A

Landscape and Townscape:

Development on the site would constitute development into open countryside and would change the character of the short distance views into the site from the adjacent properties, the public footpath which runs through the site and from Little London Lane. Some of the glimpsed views from the Paston Way would also be affected.

The properties to the south, along Swafield Rise, are predominately detached bungalows with some 2 storey houses at Acorn Close and Wharton Drive.

The site is reasonably well contained in the landscape and residential development would not be visible from medium or long distance viewpoints.

Further information (post Reg. 18) has been provided by the site promotor which shows a development of approximately 330 dwellings with a large area of open space (5.6ha) and landscaping provided to the north of the site.

Other:

The whole site is within Flood Zone 1 and there is a small area that may be at risk of surface water flooding. There are no formal environmental designations on the land. There are no heritage assets on the site.

Conclusion:

Development on the site would be an extension into open countryside and could have an adverse impact on the landscape, although this could be mitigated with the sensitive landscaping scheme suggested by the site promotor. The site has moderate to good connectivity to the town centre and services. However, it is around 2km from the railway station and other services such as the doctor's surgery and leisure centre. Although one primary school is within an acceptable walking distance, Millfield Primary School is over 2.5km which is not an acceptable walking distance.

On balance, the site is not considered suitable site for development as the preferred option offer more sustainable development options providing mixed use development and have the potential to deliver significant locally strategic benefits.

Recommendation:

That this site is **discounted from further consideration.**

Site Ref	Assessment
NW17	<p>Land West of Melbourne House, Bacton Road</p> <p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative being loosely related to the settlement within Flood Zone 1, where there is likely to be a detrimental impact on landscape due to its greenfield status and rural location. There is a potential negative biodiversity impact being in close proximity to a CWS (Alder Carr) and having a heavily treed boundary. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with access to the town centre from the site, but there is likely to be reliance on the car.</p> <p>Conclusion: The site is remote and detached from town. Highway access and the local road network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
NW18/1	<p>Land At Melbourne House</p> <p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative being loosely related to the settlement within Flood Zone 1, where there is likely to be a detrimental impact on landscape due to its greenfield status and rural location. There is a potential to affect the setting of a Grade II Listed Building (Melbourne House) and the potential for negative biodiversity impact being in close proximity to CWSs (Alder Carr, Spa Common) and being green field land (possibly grazing) and small woodland. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with access to the town centre from the site, but there is likely to be some reliance on the car.</p> <p>Conclusion: The site is reasonably remote from the town centre and services. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
NW20 & NW33	<p>Land at Marshgate & Manor Road</p> <p>SA Conclusion: The site scores as positive. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1. There is potential for a negative biodiversity impact being in close proximity to CWSs (Alder Carr, Spa Common) and arable land with mature hedgerow / trees around and within the site. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion: The site would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p>

Site Ref	Assessment
	<p>Recommendation: That this site is discounted from further consideration.</p>
NW21	<p>Land Opposite Brick Kiln Farm, Manor Road</p> <p>SA Conclusion: The site scores as positive. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1. There is potential for negative biodiversity impact being in close proximity to a CWS (Spa Common) and being arable / grazing land with mature hedgerows / trees to the majority of the boundaries. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with access to the town centre from the site, but there is likely to be some reliance on the car.</p> <p>Conclusion: The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
NW22	<p>Land At Manor Road</p> <p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative being edge of settlement, within Flood Zone 1. It's rural location means there is a likely significant detrimental impact on the landscape and a potential negative biodiversity impact being part arable, part woodland (subject to TPO) and partly adjacent to woodland. The Social objectives score positively and the Economic objectives score neutral as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with access to the town centre from the site, but there is likely to be some reliance on the car.</p> <p>Conclusion: The site is reasonably remote from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
NW23	<p>Land Between Yarmouth Road and Field Lane</p> <p>SA Conclusion: The site scores as positive. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1. The biodiversity impact is uncertain being arable and grassland with trees to boundaries and a small woodland adjacent to the north east corner. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p>

Connectivity:

The site has reasonable connectivity to the town centre and services. The catchment schools are within acceptable walking distance, however, the infants and junior schools are approximately 1.5km walking distance from the site which may be challenging for parents with younger children. North Walsham has good public transport links with both bus and rail being available.

Highways:

Highway access is possible to be achieved off Yarmouth Road, however, the Highway Authority have concerns that a safe access off the Yarmouth Road may not be acceptable as visibility is a concern due to the alignment of the road. Field lane is a narrow rural road and is unsuitable for development traffic.

It does not appear feasible to provide a footway at either side of Yarmouth Road to connect with the existing footway which is 250m to the north of the site on the western side of Yarmouth Road. However, it does appear feasible to provide a pedestrian connection to Thirlby Road to link with the public footpath that runs through the site.

Environmental:

The site consists of 2 large arable fields on the south eastern edge of the town. There are patchy hedge boundaries around all sides. The north eastern edge of the site abuts a small wood known as Cradle Hill Plantation. To the north west is modern, predominately bungalow development at Long Barrow Drive, Thirlby Road and Spurdens Crescent.

HRA (where relevant)

N/A

Landscape and Townscape:

The site consists of two large undulating fields that sit on the urban edge of North Walsham. However, the developments to the north are predominately bungalows and due to the topography are generally shielded from view. The site is an open field with a rural character which provides a buffer between the urban and the gently rolling countryside. Residential development would be highly visible in the landscape, particularly from the public footpath, from Field Lane and on the southern approach into town along the Yarmouth Road.

Other:

The whole site is within Flood Zone 1 and there is a small area that may be at risk of surface water flooding. There are no formal environmental designations on the land. There are no heritage assets on the site.

Conclusion:

The site has a number of constraints and development would adversely affect the setting of the settlement. Development of this large site would extend into the open countryside and have a negative effect on the quality of the landscape by reducing the rural character. There are concerns from the Highway Authority that the site can deliver suitable access and pedestrian connections. The site is not considered suitable site for development.

Recommendation:

That this site is discounted from further consideration.

NW24 & NW43

Land Adjacent Mushroom Farm, A149

SA Conclusion:

The site scores as **positive**. The Environmental objectives score is neutral being edge of settlement, within Flood Zone 1. The biodiversity impact is uncertain being arable land with trees to boundaries and adjacent to a small woodland. The Social and Economic objectives both score positively as the

Site Ref	Assessment
	<p>site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion:</p> <p>The site would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW26	<p>Land Adjacent Scarborough Hill House Hotel</p> <p>SA Conclusion:</p> <p>The site scores as negative. The Environmental objectives score is negative being remote from the settlement, rural in nature, within Flood Zone 1. There is a likely significant detrimental impact on the landscape and the biodiversity impact is uncertain being arable land, surrounded by mature hedgerow / trees, a tree belt to north east boundary and adjacent to the south east corner. The Social objectives score negatively and the Economic objectives score mixed as the services are located in the adjacent settlement (some within 2km of site) and there is a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW28a	<p>North Walsham Football Club</p> <p>SA Conclusion:</p> <p>The site scores as negative and positive. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1, where there is potential for negative biodiversity impact being in close proximity to a CWS (Weavers Way) and being sports pitches, surrounded by mature hedgerow / trees and in close proximity to a pond. The Social objectives score mixed and the Economic objectives score mixed as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, but would result in the loss of an open land area (sports pitches).</p> <p>Conclusion:</p> <p>This is a large open space site on the western edge of town. It is well located to the town and services. The site is not considered suitable as it forms part of the designated open space for the town and is well used as part of the football club facilities. Development would result in a loss of this beneficial use. The preferred sites can deliver sufficient housing for North Walsham without requiring the loss of this open space. The site is not considered to be suitable for development.</p> <p>Recommendation:</p>

Site Ref	Assessment
	<p>That this site is discounted from further consideration.</p>
<p>NW31</p>	<p>Land Rear of East Coast Plastics</p> <p>SA Conclusion: The site scores as positive. The Environmental objectives score is positive being within the settlement, in Flood Zone 1. There is limited biodiversity potential being mown grass, a concrete access and fencing to the boundary. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion: The site is not considered a preferred location for residential development owing to the proximity to the industrial estate and adjoining industrial uses. The highway access is considered to be unsuitable. The site is not considered to be suitable for residential development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
<p>NW34</p>	<p>Land at Spa Common</p> <p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative being loosely related to the settlement within Flood Zone 1, where there is a likely detrimental impact on the landscape due to the rural nature of the site. There is potential for negative biodiversity impact being in close proximity to CWSs (Alder Carr, Spa Common) and being grazing land, surrounded by mature hedgerow / trees. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion: The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
<p>NW36</p>	<p>Land at Little London Road</p> <p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative being removed from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape. There is potential for a negative biodiversity impact being in close proximity to CWS (Paston Way and Knapton Cutting) and being grazing land, surrounded by mature hedgerow / trees. The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services /</p>

Site Ref	Assessment
	<p>facilities and the town centre (adjacent settlement).</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW40	<p>Adjacent Holmfield, Little London</p> <p>SA Conclusion:</p> <p>The site scores as negative. The Environmental objectives score is negative being removed from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape. There is potential for a negative biodiversity impact being in close proximity to CWSs (Alder Carr, Spa Common) and grazing land, surrounded by mature hedgerow / trees. The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW42	<p>Land Adjacent Happisburgh Road</p> <p>SA Conclusion:</p> <p>The site scores as positive. The Environmental objectives score is neutral being edge of settlement, in Flood Zone 1, where the biodiversity impact is uncertain being grazing land surrounded by mature trees / shrubs and adjacent to a small area of woodland. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion:</p> <p>The site is reasonably remote from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>

NW46

Land at Fernbank, West of Bacton Road

SA Conclusion:

The site scores as **negative and positive**. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1 where there is a potential significant detrimental impact on landscape (loss of trees). The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with access to the town centre from the site.

Conclusion:

The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.

Recommendation:

That this site is discounted from further consideration.

NW47

Land Adjacent Royston Cottage, Little London

SA Conclusion:

The site scores as **negative**. The Environmental objectives score is negative being removed from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape. There is potential for a negative biodiversity impact being in close proximity to CWS (Spa Common) and being grazing land with mature hedgerow / trees around and within the site. The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).

Conclusion:

The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.

Recommendation:

That this site is discounted from further consideration.

NW48

Land North of Royston Cottage, Little London

SA Conclusion:

The site scores as **negative**. The Environmental objectives score is negative being removed from the settlement, partly within Flood Zone 2, where its rural nature could have a significant detrimental impact on the landscape. There is a potential negative biodiversity impact being in close proximity to a CWS (Spa Common). The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).

Conclusion:

Site Ref	Assessment
	<p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
<p>NW49</p>	<p>Land at 22 Skeyton Road</p> <p>SA Conclusion:</p> <p>The site scores as negative and positive. The Environmental objectives score is mixed being edge of settlement, partly Previously Developed Land within Flood Zone 1, where there is a potential negative biodiversity impact being adjacent to a CWS (Weavers way) and arable / grazing / garden land with mature trees / hedgerow surrounding and an adjacent copse. The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion:</p> <p>The site is adjacent to the settlement boundary and any review of the boundary should take into account the new western extension.</p> <p>Recommendation:</p> <p>This is a small site that may be more appropriate to come forward through an application process.</p>
<p>NW50</p>	<p>Land South of Anchor Road</p> <p>SA Conclusion:</p> <p>The site scores as negative and positive. The Environmental objectives score is negatively being loosely related to the settlement, within Flood Zone 1, where approximately one third of site is potentially susceptible to Surface Water Flooding (CC). The rural nature of the site means there could be a likely detrimental impact on the landscape and there is potential for a negative biodiversity impact being in close proximity to CWSs (Alder Carr, Spa Common).</p> <p>The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with access to the town centre from the site, but there is likely to be reliance on the car.</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
<p>NW51</p>	<p>Land at Southcroft, Yarmouth Road</p>

	<p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative being removed from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape (loss of trees) and potential for a negative biodiversity impact being woodland. The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Conclusion: The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation: That this site is discounted from further consideration.</p>
--	--

<p>NW52</p>	<p>Land East of Bradfield Road (Employment Site)</p> <p>SA Conclusion: The site scores as negative. The Environmental objectives score is negative. The site is edge of settlement (adjacent to an implemented employment site) and within Flood Zone 1, but the rural nature of the site means there is a potential likely significant detrimental impact on the landscape and the biodiversity impact is uncertain being arable land. The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Connectivity: As an employment site it has excellent connectivity with the existing employment land, being a northern extension to the industrial estate. The site is reasonably well located to the residential areas of North Walsham and is within cycling and walking distance of most of the town. The site is reasonably distant from public transport services with the nearest bus stop being around 1km away and the rail station 2.5km.</p> <p>Highways: Highway access is possible off Bradfield Road, however, at present this access is unacceptable as Bradfield Road is unsuitable for employment development traffic into the site. The delivery and bringing forward of the site is contingent on the delivery of a new road from Cornish Way. This site does offer the opportunity to provide land that could facilitate delivery of highway improvements that would benefit access into the site and also improve access into the industrial estate which would offer significant strategic benefits for the town.</p> <p>Environmental: The site is a small arable field that is bounded by hedges and with a newly planted tree belt to the eastern boundary. To the east of the site is the allocated extension of the industrial estate.</p> <p>HRA (where relevant) N/A</p> <p>Landscape and Townscape:</p>
--------------------	---

	<p>Employment development on the site would constitute an urban expansion into the rural edge of North Walsham. Development would be visible from the small number of properties in the area and from Bradfield Road. Low level development, with sympathetic and complimentary uses would mitigate the landscape impact of the development.</p> <p>Other:</p> <p>The whole site is within Flood Zone 1 and there is a small area that may be at risk of surface water flooding. There are no heritage assets on the site or in the vicinity.</p> <p>Conclusion:</p> <p>The site is available and if allocated there is no evidence to suggest that development is undeliverable. This site offers the opportunity to provide further employment land for the town whilst also the potential to deliver strategic highway improvements.</p> <p>Recommendation:</p> <p>That this site is identified as a Proposed Allocation of approximately 2ha of employment land. Allocation is subject to the facilitation of strategic highway connections including an access connection to Bradfield Road and Cornish Way. The policy requirements will be revised if any new substantive issues are identified in the HRA and/or Heritage Impact Assessment.</p>
<p>NW54</p>	<p>Land West of Manor Road</p> <p>SA Conclusion:</p> <p>The site scores as negative. The Environmental objectives score is mixed being removed from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape and an uncertain biodiversity impact, being arable land surrounded by mature trees / hedgerows and adjacent to a small woodland (subject to TPO). The Social objectives score negatively and the Economic objectives score mixed as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
<p>NW55</p>	<p>Land Between Manor Road & Happisburgh Road</p> <p>SA Conclusion:</p> <p>The site scores as negative. The Environmental objectives score is negative being removed from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape and an uncertain biodiversity impact, being arable land surrounded by mature trees / hedgerows and adjacent to a small woodland The Social and Economic objectives both score negatively as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Conclusion:</p>

Site Ref	Assessment
	<p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW60	<p>Land Between Lyngate Road And The Street</p> <p>SA Conclusion:</p> <p>The site scores as negative and positive. The Environmental objectives score is negative being edge of settlement, within Flood Zone 1, where there is potential to affect the settings of a Grade II Listed Building (The Thatched Cottage) and Grade II* Listed Building (Friends Meeting House). There is potential for negative biodiversity impact being close in proximity to CWS (Paston Way & Knapton Cutting). The Social and Economic objectives both score positively as the site has good access to services / facilities, employment and educational facilities as well as leisure and cultural opportunities, with easy access to the town centre from the site.</p> <p>Conclusion:</p> <p>The site is remote and detached from the town centre and services. It would be an extension into open countryside and could have an adverse impact on the landscape. Highways access and the local network are considered to be unsuitable. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW61	<p>Wayside Farm, Skeyton Road</p> <p>SA Conclusion:</p> <p>The site scores as negative. The Environmental objectives score is negative being remote from the settlement, within Flood Zone 1, where the rural nature of the site means there is a potential likely significant detrimental impact on the landscape and the potential negative biodiversity impact being in close proximity to a CWS (Weavers Way). The Social and Economic objectives both score negatively as the services are in the adjacent settlement (some within 2km of site) and there would be a likely reliance on the car to access employment, educational facilities and services / facilities and the town centre (adjacent settlement).</p> <p>Conclusion:</p> <p>The site is reasonably remote from town and would have an adverse impact on the landscape. The site is not considered to be suitable for development.</p> <p>Recommendation:</p> <p>That this site is discounted from further consideration.</p>
NW62	<p>Western Extension (Regulation 18 extent)</p> <p>SA Conclusion:</p> <p>The site scores as positive. The Environmental objectives score is mixed being edge of settlement,</p>

within Flood Zone 1 where there is potential to impact the setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns) and Scheduled Monument & Grade II Listed Cross (Stump Cross) as well as the potential for significant detrimental landscape impact but potential for significant landscaping mitigation and cohesive design / master planning. There is also potential for negative biodiversity impact as parts of site are within close proximity / adjacent to CWS (Weavers Way). The Social and Economic objectives both score positively as the majority of the site has good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. In addition, the scale of the site would potentially enable, through master planning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.

Connectivity:

The site has excellent connectivity and all catchment schools are within reasonable walking distance. The town centre and the employment areas are within walking and cycling distance and the town has a range of employment, shopping and leisure opportunities.

The site is a large extension to the west of the main town and there will be areas within the site that may have variable connectivity. However, the delivery of the site offers the opportunity to provide significant improvements for connectivity into the town including improvements to the Weavers Way and the public footpaths running through the site. This connectivity enhancement should offer the opportunity for improved cycle connections and improved connections to the wider countryside.

North Walsham offers excellent sustainable transport options with regular bus and rail services available to a number of destinations including Sheringham, Cromer and Norwich. Rail services to Norwich take 30mins are every hour. The bus stops are located within 2500m of the site, although there will be the opportunity to consider bus routing options through the site.

Highways:

A high level evidence study has been produced to consider the transport impacts of the development. The existing highway network of North Walsham will come under increased pressure as a result of traffic growth associated with the site. However, the delivery of a Western Link Road (WLR) is expected to mitigate most of the traffic impacts that the growth proposed in North Walsham could cause. Additionally, the WLR is expected to solve some of the existing routing issues for HGVs caused by the low bridges in the town. This high-level study also identifies that the possible WLR extensions should potentiate the benefits of the WLR and that it is feasible to deliver the WLR and its possible northern and southern extensions.

In order to deliver the northern extension to the Link Road further land may have to be allocated north east of the railway line. It may also be advantageous to allocate further land to the south east to ensure that any highway scheme onto the Norwich Road has enough land to accommodate any highway infrastructure required.

Environmental:

This is an extremely large site (over 95ha), however, the majority of the site south of Cromer Road consists of a number of arable fields with associated hedge and ditches. To the north of Cromer Road, it is predominately brownfield land. There are no formal designations or significant environmental constraints within the site.

HRA (where relevant)

N/A

Landscape and Townscape:

North Walsham is not within the North Norfolk Coast AONB (4 km to the north). The site does have the potential for a significant localised impact on the landscape owing to the size and proposed scale of the growth. However, there are opportunities to plan a comprehensive landscape led development that would mitigate the potential impacts and improve the landscape setting of the town in other areas. There is an opportunity to provide further land to the south of the allocation to

	<p>provide the opportunity for a landscaping and green infrastructure buffer.</p> <p>Other: The whole site is within Flood Zone 1 and there are various small areas of land through-out the allocation that may be at risk of surface water flooding. There are no formal environmental designations on the land. There are no heritage assets on the site, however, there is a historic battlefield site (not statutory registered) to the south of the site which relates to a battle during the ‘Peasants Revolt’ of 1381. A number of the Scheduled Ancient Monuments in the area are medieval stone crosses that commemorate and mark the location of the battle.</p> <p>Conclusion: The site is available and if allocated there is no evidence to suggest that development is undeliverable. However, in order to deliver the northern extension of the Link Road into the industrial estate, further land should be allocated to the north east of the railway. An enlarged landscape buffer should also be delivered to the south of the site.</p> <p>Recommendation: This site will be enlarged to include further land to the south and all of parcels NW08/1 & NW08/2 and land to the north of the railway to include NW15/2. This site is now discounted from consideration.</p>
--	--

NW62/A	<p>Western Extension</p> <p>SA Conclusion: The site scores as positive. The Environmental objectives score is mixed being edge of settlement, within Flood Zone 1 where there is potential to impact the setting of Grade II Listed Buildings (Bradmoor Farmhouse & two barns), as well as the potential for significant detrimental landscape impact but potential for significant landscaping mitigation and cohesive design / master planning. There is also potential for negative biodiversity impact as CWS (Weavers Way) crosses the middle section of the site. The Social and Economic objectives both score positively as the majority of the site has good access to local healthcare service, education facilities, peak time public transport links, leisure and cultural opportunities. In addition, the scale of the site would potentially enable, through master planning, additional school, employment, open space, green infrastructure and improved road infrastructure opportunities.</p> <p>Connectivity: The site has good potential connectivity and all catchment schools are within reasonable walking distance. The town centre and the employment areas are within walking and cycling distance and the town has a range of employment, shopping and leisure opportunities.</p> <p>The site is a large extension to the west of the main town and there will be areas within the site that may have variable connectivity. However, the delivery of the site offers the opportunity to provide significant improvements for connectivity into the town including improvements to the Weavers Way and the public footpaths running through the site. This connectivity enhancement should offer the opportunity for improved cycle connections to the town’s services and improved connections to the wider countryside.</p> <p>North Walsham offers excellent sustainable transport options with regular bus and rail services available to a number of destinations including Sheringham, Cromer and Norwich. Rail services to Norwich take 30mins are every hour. The bus stops are located within 2500m of the site, although there will be the opportunity to consider bus routing options through the site.</p> <p>Highways: A high level evidence study has been produced to consider the transport impacts of the</p>
--------	--

development. The existing highway network of North Walsham will come under increased pressure as a result of traffic growth associated with the site. However, the delivery of a Western Link Road (WLR) is expected to mitigate most of the traffic impacts that the growth proposed in North Walsham could cause. Additionally, the WLR is expected to solve some of the existing routing issues for HGVs caused by the low bridges in the town. This high-level study also identifies that the possible WLR extensions should potentiate the benefits of the WLR and that it is feasible to deliver the WLR and its possible northern and southern extensions.

This site proposes an allocation of further land (NW15/2) to the north east of the railway to ensure that land that may be required for highway works at the railway bridge form part of the allocated site. Furthermore, a southern extension of the site (on parts of NW08/1 & NW08/2) will allow for increased options for any junction arrangement and routing of the proposed Link Road.

Environmental:

This is an extremely large site (over 95ha), however, the majority of the site south of Cromer Road consists of a number of arable fields with associated hedge and ditches. There is a small pond to the south of the site. To the north of Cromer Road, it is predominately brownfield land. There are no formal designations or significant environmental constraints within the site.

This enlarged parcel allocates further land to the southernmost extent of the site. This extension will allow for an increased environmental and green infrastructure buffer between the allocated site, the Heath and Battlefield site to the south.

HRA (where relevant)

N/A

Landscape and Townscape:

North Walsham is not within the North Norfolk Coast AONB (4 km to the north). The site does have the potential for a significant localised impact on the landscape owing to the size and proposed scale of the growth. However, there are opportunities to plan a comprehensive landscape led development that would mitigate the potential impacts and improve the landscape setting of the town in other areas. The southern extension of the site will allow for increased landscape and environmental buffer between the site and the Heath and Battlefield site to the south and the provision of a large area of green infrastructure.

Other:

The whole site is within Flood Zone 1 and there are various small areas of land throughout the site that may be at risk of surface water flooding. There are no formal environmental designations on the land. There are no heritage assets on the site, however, there is a historic battlefield site (not statutory registered) to the south of the site which relates to a battle during the 'Peasants Revolt' of 1381. A number of the Scheduled Ancient Monuments in the area are medieval stone crosses that commemorate and mark the location of the battle.

Conclusion:

The site is available and if allocated there is no evidence to suggest that development is undeliverable. Work is progressing on the delivery of a comprehensive Development brief for the site that will consider all of the above issues in much more detail. This enlarged site provides increased resilience for transport and highway options and the opportunity for significantly increased landscaping and green infrastructure provision.

Recommendation:

That this site is identified as a Proposed Allocation of approximately 1800 dwellings, 7ha of employment land, a new link Road and associated infrastructure. Allocation is subject to the detailed policy requirements and the production of a comprehensive development brief for the site. The policy requirements and development brief will be revised if any new substantive issues are identified in the HRA and/or Heritage Impact Assessment.

Further Comments

The following additional comments have been received since the Regulation 18 consultation.

Further Comments	
Landowner	<p>Site NW16, Land at End of Mundesley Road: Further information submitted by site promoters.</p> <p>The site promoters provide detailed information regarding a number of matters including: access and transport, landscape and an illustrative layout. This information was considered and taken into account in the revised site appraisal.</p>
Transport	<p>Transport Study 2020 (Nov 2020)</p> <p>The study provides a high-level traffic assessment of the growth allocated in the emerging Local Plan of NNDC in North Walsham. Additionally, this study includes a high-level feasibility study of delivering a Western Link Road, which is also to be included within the emerging Local Plan. Possible northern and southern extensions of the WLR have also been investigated, to determine whether this could bring additional benefits to the highway network and its users.</p>
Utilities (Power)	<p>UK Power Networks (march 2020).</p> <p>UKPN provided high-level information concerning capacity of the power network in North Norfolk. It was highlighted that there are currently no significant supply issues for North Walsham. However, this will be explored in more detail through the development brief process.</p>

Part 3: Overall Site/Settlement Conclusions

3.1. Proposed Site Allocations: Reasoned Justification

North Walsham does not have the significant environmental and landscape constraints that are found elsewhere in the District. It is not in the AONB, close to the Broads or in proximity to any international designated sites. Whilst over the Plan period it is expected that a process of re-development, infill developments, and changes of use will continue to provide a supply of new homes and other uses, these opportunities are relatively modest and will not address the identified need for new homes in particular. New greenfield allocations are therefore necessary in order to deliver the required growth.

The scale of growth envisaged in North Walsham will allow for the delivery of infrastructure that is of local strategic importance, namely, the delivery of highway improvements and significant areas of open space and green infrastructure.

There were over 50 sites to consider in North Walsham, which were predominately greenfield sites around the edge of the town. Discounted sites were not chosen for a number of reasons including the impact development could have on the landscape and countryside more generally. Those sites with adverse junction and cumulative highway network impacts and those where suitable vehicular access isn't achievable were also ruled out. Some sites were not well connected to key services and the town centre by walking, cycling or public transport were considered unsuitable. Site selection has also sought to avoid sites which are detached from the town and not well related to the existing built up areas.

The delivery of a larger number of smaller sites around the town may deliver the appropriate level of housing required, however, there are concerns that such a strategy would not deliver the strategic infrastructure benefits for the town, namely improved transport infrastructure, enhanced green infrastructure & open space and other community infrastructure such as a new primary school.

Two sites for mixed use allocation have been identified as the preferred options for North Walsham with an allocation of approximately 2150 new dwellings. Another site has been identified for allocation as employment land providing a further 2ha of land adjacent to the existing industrial estate. It will provide land for a new strategic road link from the western link road that will provide access into the industrial estate and onto the wider network.

These 3 sites are considered to be the most suitable sites available for North Walsham and subject to the detailed policy requirements these sites are considered to be the most appropriate options to meet the housing and employment land requirement. Each are well located to services within the town centre, existing employment land and to the local schools (both existing and proposed), they are reasonably contained within the landscape and will deliver the strategic infrastructure required.

None of the selected sites are subject to insurmountable constraints and the consultation process has shown that they are deliverable over the Plan period provided that development proposals come forward which comply with the suggested policies of the Plan (as modified following the consultation).

The following sites have been chosen as preferred sites, and meet the requirements for North Walsham:

NW62: The 'Western Extension' is a sustainable urban extension to the west of the town and will provide up to 1800 new houses, 7 hectares of employment land and a site for a new primary school. The Western Extension will deliver a new western link road which will mitigate the impact of the

development traffic and improve general transport network conditions in the town. It will deliver significant amount of public open space and new green infrastructure.

NW01/B: Land at Norwich Road & Nursery Drive will have an allocation of up to 350 dwellings, 2 hectares of employment land and will improve connectivity between previously developed residential sites. It will deliver 3.5ha public open space.

NW52: Land East of Bradfield Road will provide approximately 2.4ha of employment land plus land for a new highway connection (and highway improvements) between Cornish Way and Bradfield Road.

3.2. List of Site Allocations

Residential Sites

Site Ref	Description	Gross Area (ha)	Indicative Dwellings
NW01/B	Land at Norwich Road & Nursery Drive	18.62	350
NW62/A	North Walsham Western Extension	108.3	1800

Employment Site

Site Ref	Description	Gross Area (ha)
NW52	Land East of Bradfield Road	2.4ha

3.3. Policy Wording (Regulation 19)

The following tables detail the emerging policy text as intended for inclusion in the Regulation 19 stage Local Plan.

Policy NW01/B

Land at Norwich Road & Nursery Drive

Land amounting to approximately 18.6 hectares is proposed to be allocated for a mixed-use allocation including residential development of approximately 350 dwellings, the retention and enhancement of 2 hectares of existing employment land and provision of 3.5 hectares of public open space.

Development proposals would need to comply with a number of policies (including those relating to affordable housing, open space, supporting infrastructure) elsewhere in this plan and the following site specific requirements:

Production of a Development Brief

Prior approval of a development brief is required to provide the over-arching guidance on the broad distribution of land use and the guiding principles against which future planning applications will need to address, including:

1. the location and delivery of the linking estate road to provide appropriate points of vehicle access to Norwich Road through the adjoining previously developed parcels of allocation NW01, together with details of how all land parcels are to be serviced;

2. the initial phase of development is limited to approximately 150 dwellings which must also deliver the estate link road and access to service all parcels;
3. the location and typologies of the 3.5 hectares of public open space;
4. a strategy for the retention of the two existing business on employment land of no less than 2 hectares. There will need to evidence that the existing employment uses have been adequately retained within the site or have relocated to suitable alternative premises;
5. access, movement, mix of uses, layout, built form, density of development, landscaping and conceptual appearance;
6. provision of improved pedestrian links to the railway station, town centre and local schools;
7. effective surface water management plan ensuring that there are no adverse effects and greenfield run off rates are not increased;
8. details of a foul drainage strategy setting how additional foul flows will be accommodated within the foul sewerage network.

Policy NW62/A

North Walsham Western Extension

Land amounting to approximately 108 hectares is proposed to be allocated for a mixed use development to include approximately 1,800 dwellings. Development proposals would need to comply with a number of policies (including those relating to affordable housing and other supporting infrastructure) elsewhere in this Plan and the following site specific requirements:

Development Brief

The allocation will be subject to the production of a comprehensive site wide Development Brief. The Development Brief will provide the over-arching guidance on the broad distribution of land use and the guiding principles against which future planning applications will be considered.

The development brief is to include:

1. overall aims and vision for the western extension in line with the Local Plan policies;
2. a strategy for the early delivery of the western link road;
3. a phasing strategy for the delivery of all land uses; including residential, employment and small scale retail;
4. an overall design framework building on the principles of the District's most up to date Design Guide;
5. a strategy for the delivery of essential infrastructure and mitigation measures, including (but not exclusively):
 - primary school;
 - highways mitigation to include a package of measures to mitigate the impact of the development on the highway network;
 - appropriate levels of affordable housing and housing & care provision for older people.
 - the production of a 'Health Impact Assessment' of the healthcare impacts arising from the proposed development;
6. a Green Infrastructure Delivery Strategy to include:
 - significant levels of public open space with a minimum of 25ha including an area of strategic open space to the south of the development;

- enhancements to the Weavers Way and provision of a network of new pedestrian and cycle routes;
- enhancement to all public rights of way to and through the site;
- mitigation and enhancement proposals for Bryant's Heath SSSI;
- water, flooding & drainage management;
- to consider options for the enhancement to North Walsham Football Club.

The Development Brief will be developed in partnership between the landowners / promoters and the Council and will be subject to public consultation.

Not all land parcels will deliver housing and other uses such as employment, local retail, landscaping or open space may be more suitable for some sites (in part or whole). It is expected that the landowners may need to work together on an equalisation agreement to ensure that all the assembled land is recognised as forming an integral part of the overarching western extension.

Policy NW52

Land East of Bradfield Road

Land amounting to approximately 2.4 hectares is proposed to be allocated for employment development, subject to:

1. provision of acceptable highway access, including provision for a connection to a future access road from Bradfield Road to Cornish Way including the safeguarding of land along Bradfield Road for highway improvements;
2. provision of extra landscaping around the site;
3. effective surface water management plan ensuring that there are no adverse effects and greenfield run off rates are not increased;
4. details of a foul drainage strategy setting how additional foul flows will be accommodated within the foul sewerage network.

3.4. Open Space Designations

The areas tabled below, and shown on the map in **Appendix 3**, are proposed to be protected in the Local Plan through designation as one or more types of open spaces. These areas were consulted on at the Regulation 18 stage and are an extract from the Amenity Green Space Topic Paper, May 2019. They mainly comprise areas of functional open space, allotments and other visually important green spaces, the majority of which have been designated for many years.

No comments were received as part of the consultation.

Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
Land off Hadfield Road & B1145	AGS/NWS01	OSP072	Open Land Area	The majority of the site is publically accessible currently used for informal recreation and open space, contributes to the layout and character of the settlement. Tree line acts as a buffer to road and adjacent industrial estate.
Land at Mayfield Way / Acorn Road	AGS/NWS02	OSP073	Open Land Area	Publically accessible currently informal recreation and contributes to the layout and function of the estate.
Bluebell Pond, Bacton Road	AGS/NWS03	OSP074	Open Land Area	The land is publically accessible, tranquil with high biodiversity value and contributes to the layout and character of the settlement.
Cemetery, Bacton Road (East)	AGS/NWS04	OSP075	Open Land Area	Publically accessible cemetery which provides a quiet mature green space that contributes to the layout and character of the settlement. Includes land for future cemetery expansion but which is currently used as allotments.
Cemetery, Bacton Road (West)	AGS/NWS05	OSP076	Open Space	The land is publically accessible Cemetery provision.
North Walsham Junior & Infant school Playing Field, Manor Road	AGS/NWS06 REC/NWS01	OSP077	Open Land Area Formal Education / Recreation	The land provides green space in conjunction with the school, important Amenity Green Space and sporting facilities
Spa Common Folly , Manor/ Brick Kiln Road (Land off Manor Road)	AGS/NWS07	OSP078	Open Land Area	The land is managed woodland that provides a safe walking area and contributes to the edge of settlement character.

Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
St Nicholas Churchyard, Market Place	AGS/NWS08	OSP079	Open Land Area	Publically accessible provides for cemetery provision and provides green space and pedestrian links through the town centre. Contributes to the layout and character of the settlement.
War Memorial Park, New Road/ Yarmouth Rd	AGS/NWS09	OSP080	Open Land Area	Publically accessible large recreation area that provides open space and contributes to the layout and character of the settlement.
Land off Fairview Road (Sadlers Wood)	AGS/NWS10	OSP081	Open Land Area	The land is publically accessible currently used for informal recreation, is a Green Flag award winner and contributes to the edge of settlement character.
North Walsham High School Playing Field. Spencer Avenue	AGS/NWS11 REC/NWS02	OSP082	Open Land Area Formal Education / Recreation	The land provides green space in conjunction with the high school providing amenity green space and sporting facilities.
Sacred Heart Churchyard	AGS/NWS12	OSP083	Open Land Area	Publically accessible churchyard (which also includes curtilage of adjacent dwelling and other buildings) contributes to the layout and character of the settlement.
Land Between Railway Line & A149	AGS/NWS13	OSP084	Open Land Area	Publically accessible, provides open land and pedestrian/ cycle linkage.
Trackside Park, A149	AGS/NWS14	OSP085	Open Land Area	The land is publically accessible currently used for informal recreation and contributes to the layout and character of the settlement.
Playing field and Victory Swim & Fitness Centre, Station Rd	AGS/NWS15 REC/NWS03	OSP086	Open Land Area Formal Education / Recreation	The open land area forms part of Paston College and provides sports pitch facilities.
Millfield Primary & Pre-School School Playing Field, South Rise	AGS/NWS16 REC/NWS04	OSP087	Open Land Area Formal Education / Recreation	Provides green space and formal sporting facilities for the school.
Land off Hornbeam Road	AGS/NWS17	OSP088	Open Land Area	Provides open land area as part of commenced

Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
				development – previously allocated land NW01
Land at Smedley Close	AGS/NWS18	OSP089	Open Land Area	Provides open land area as part of commenced development – previously allocated land NW01
Land at Bailey Road	AGS/NWS19	OSP090	Open Land Area	Provides open land area as part of commenced development – previously allocated land NW01
Land at Roper Way	AGS/NWS20	OSP091	Open Land Area	Provides open land area as part of commenced development – previously allocated land NW01
Land at Cousens Close	AGS/NWS21	OSP092	Open Land Area	Provides open land area as part of commenced development – previously allocated land NW01
Land off Laundry Loke	AGS/NWS30	N/A	No Designation	The specific designation for Open Land Area does not provide any recreational facilities and is not visible from the surrounding area. Any application should provide AGS in line with policy requirements of the Core Strategy and Site allocation (2011), Policy NW25, should the site be promoted for development.
Football Ground, Greens Road	AGS/NWS31	OSP093	Formal Education / Recreation	The site provides for sports activity and formal sports provision.
Additional Sites				
New Road Bowling Club	REC/NWS05	OSP094	Formal Education / Recreation	Site provides formal Bowling green.
Hollybush Road Play Area	AGS/NWS22	OSP095	Open Land Area	Land is publically accessible currently used for play and contributes to the layout and function of the estate.
Local Green Space				
Pigneys Wood, Hall Lane, Knapton	LGS/NW01	N/A	No Designation	The site does not meet the tests for LGS or AGS. The site is already designated as a County Wildlife Site, and is an extensive tract of land.

Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
Canal area (between disused railway and North Walsham Road), North of Little London Road	LGS/NW02	N/A	No Designation	The site does not meet the tests for LGS or AGS. Although is considered to have some local significance it is an extensive tract of land which does not meet the criteria for designation as Local Green Space.
Old Mundesley Rail Line, North East of Mundesley Road	LGS/NW03	N/A	No Designation	The site does not meet the tests for LGS or AGS. Site is already protected as a County Wildlife Site. Considered no additional benefit would be gained from LGS designation.
Burial Ground, Mundesley Road	LGS/NW04 AGS/NWS23	OSP096	Open Land Area	The site does not meet the tests for LGS. Historical Churchyard – just outside settlement
Land North of Harbord Close	LGS/NW05 AGS/NWS24	OSS097	Open Land Area	The site does not meet the tests for LGS .The land is publically accessible currently used for informal recreation and contributes to the layout and function of the estate.
Land South of Harbord Close	LGS/NW06 AGS/NWS25	OSP098	Open Land Area	The site does not meet the tests for LGS .The land is publically accessible currently used for informal recreation and contributes to the layout and function of the estate.
Meadow Court Play Area, Off Patch Meadow	LGS/NW07 AGS/NWS26	OSP099	Open Land Area	The site does not meet the tests for LGS .The land is publically accessible currently used for play and informal recreation and contributes to the layout and function of the estate.
Acorn Road Play Area	LGS/NW08	OSP073	Open Land Area	The site does not meet the tests for LGS. Site already benefits from open land area designation and functions as AGS
Playing field, Hadfield Road	LGS/NW09	OSP072	Open Land Area	The site does not meet the tests for LGS. Site already benefits from open land area designation and functions as AGS
Bacton Road Cemetery	LGS/NW10	OSP075 / OSP076	Open Land Area	The site does not meet the tests for LGS. Site already

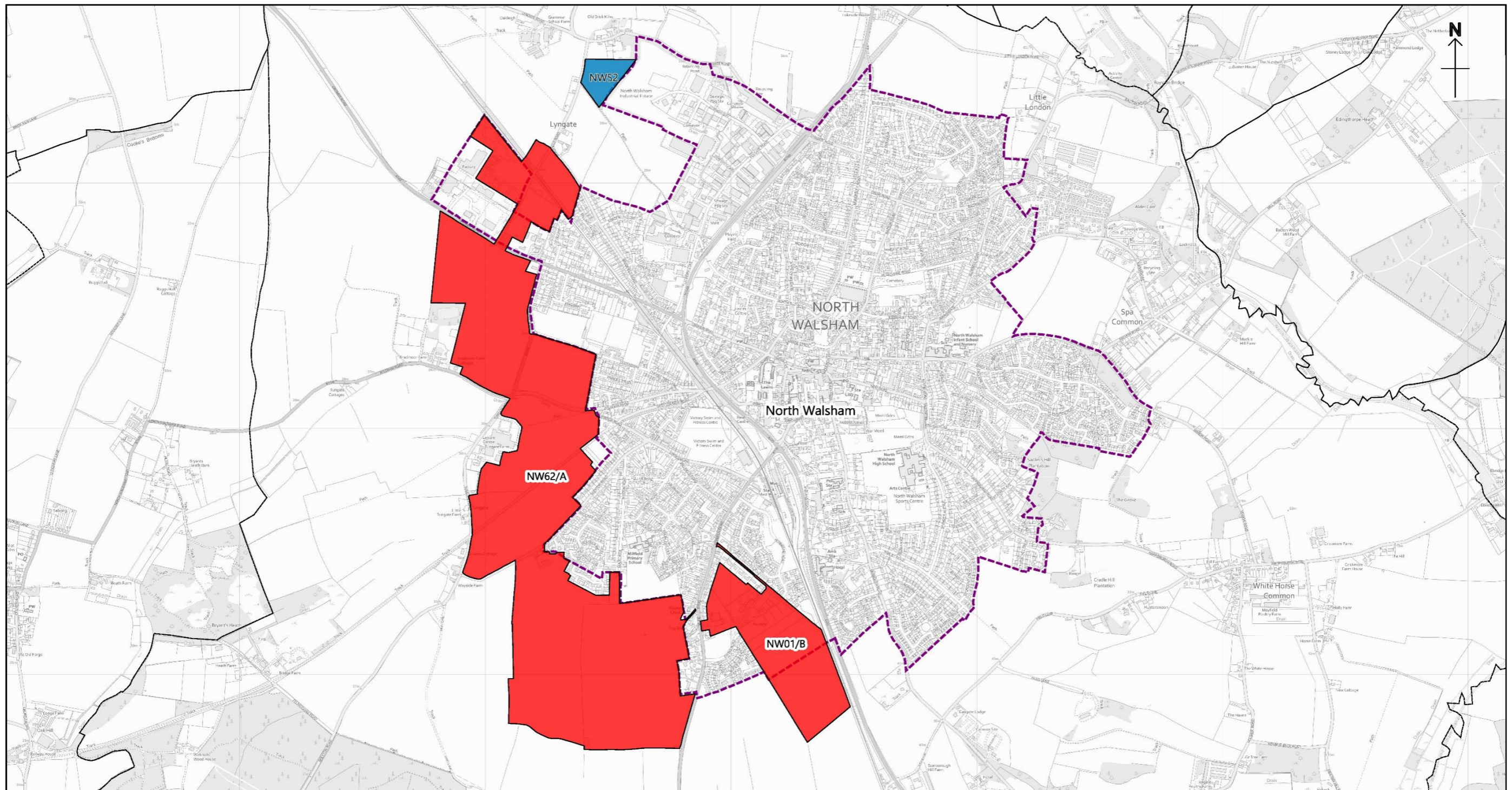
Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
				benefits from open land area designation and functions as AGS
Manor Road School Playing Field	LGS/NW11	OSP077	Open Land Area Formal Education / Recreation	The site does not meet the tests for LGS, already benefits from open land area designation and education & formal recreation designation. The site does not meet the criterion of being able to endure beyond the plan period (because a school must be able to reconfigure if necessary). Large tract of land.
Spa Common Folly, Off Manor Road	LGS/NW12	OSP078	Open Land Area	The site does not meet the tests for LGS pen land area designation. Site already benefits from open land area designation
Sadler's Hill Plantation, Between Fairview Road & Happisburgh Road	LGS/NW13 AGS/NWS27	OSP100	Open Land Area	The site does not meet the tests for LGS. The land is publically accessible currently used for informal recreation. Adjacent and connects through AGS/NWS10.
Cradle Hill Plantation, Happisburgh Road	LGS/NW14	N/A	No Designation	The site does not meet the tests for LGS or AGS.
High School Playing Field, Spenser Avenue	LGS/NW15	OSP082	Open Land Area Formal Education / Recreation	The site does not meet the tests for LGS. The site already benefits from open land area designation and education & formal recreation designation. The site does not meet the criterion of being able to endure beyond the plan period (because a school must be able to reconfigure if necessary)
War Memorial Park, Yarmouth Road	LGS/NW16	OSP080	Open Land Area	The site does not meet the tests for LGS. The site already benefits from open land area designation.
St Nicholas's Churchyard, Market Place	LGS/NW17	OSP079	Open Land Area	The site does not meet the tests for LGS. The site already benefits from open land area designation

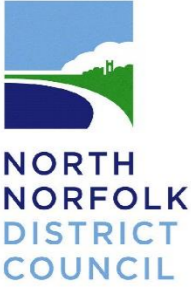




Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
Land at Paston College, Grammar School Road	LGS/NW18 AGS/NWS28	OSP101	Open Land Area	The site does not meet the tests for LGS .Provides an important setting for the Listed Paston College Building
Football Ground, Greens Road	LGS/NW19	OSP093	Formal Education / Recreation	The site does not meet the tests for LGS. The site is promoted as a development site in the adopted Local Plan, subject to policy conditions including the replacement facilities. The site already benefits from open land area designation and currently provides sports pitches.
Land between Railway Line & A149	LGS/NW20	OSP084	Open Land Area	The site does not meet the tests for LGS. Site already benefits from open land area designation.
Trackside Park, Norwich Road	LGS/NW21	OSP085	Open Land Area	The site does not meet the tests for LGS. Site already benefits from open land area designation
Playing Field and Victory Swim & Fitness Centre, Station Road	LGS/NW22	OSP086	Open Land Area Formal Education / Recreation	The site does not meet the tests for LGS. The site is an extensive tract of land, already benefits from open land area designation. The majority of this site is currently an education allocation in the Local Plan. The site does not meet the criterion of being able to endure beyond the plan period and is therefore not proposed for designation as LGS.
Land off Laburnum Road	LGS/NW23	N/A	No Designation	The site does not meet the tests for LGS or AGS. It is currently a hard surface and garages.
Land off Recreation Road	LGS/NW24	N/A	No Designation	The site does not meet the tests for LGS or AGS. It is currently a grouping of domestic gardens
Play Area, Gigli Close	LGS/NW25 AGS/NWS29	OSP102	Open Land Area	The site does not meet the tests for LGS .The land is publically accessible currently used for informal recreation and contributes

Site Location	AGS Study Reference	Local Plan Reference	Recommendation	Reasoned Justification Summary
				to the layout and function of the estate

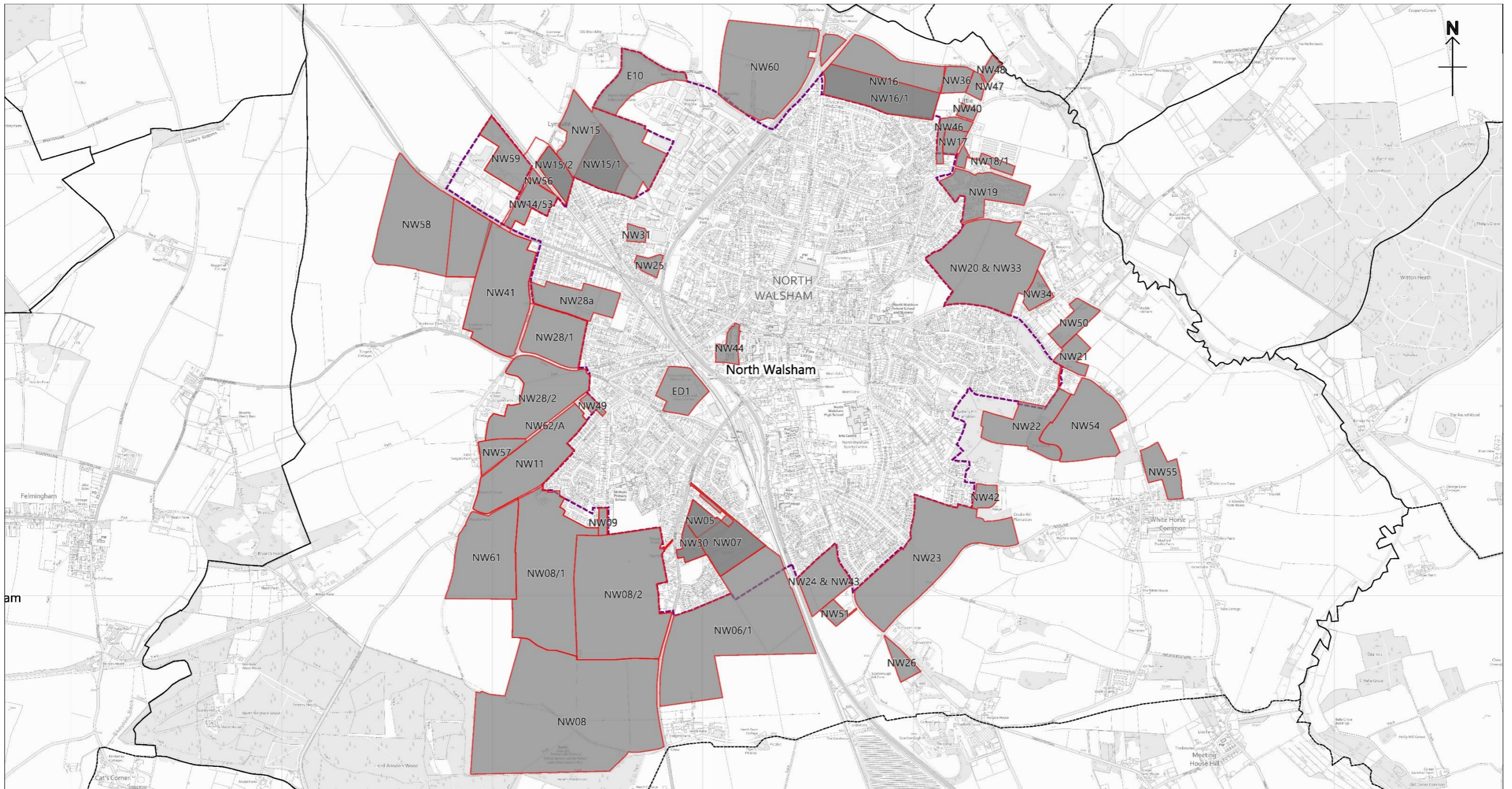
DRAFT

Appendix 1: Preferred Sites

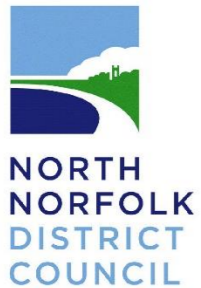


 <p>NORTH NORFOLK DISTRICT COUNCIL</p>	<p>North Walsham - Preferred Sites (Reg 19)</p>		<p>NOT TO SCALE</p>	<p>CB</p>	<p>© Crown Copyright and database right 2020 Ordnance Survey 100018623 Aerial Photos ©Getmapping plc</p>	
	<p> Preferred Housing / Mixed Use Allocation</p>	<p> Preferred Employment Allocation</p>	<p> Existing Settlement Boundary</p>	<p>03/12/2020</p>		
	<p> Parish Boundary</p>			<p>North Norfolk District Council Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN 01263 513811 www.north-norfolk.gov.uk</p>		

Appendix 2: Alternative Sites



Page 269



North Walsham - Alternative Sites (Reg 19)

- Alternative Site Considered
- Parish Boundary
- Existing Settlement Boundary

NOT TO SCALE CB

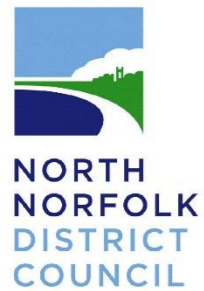
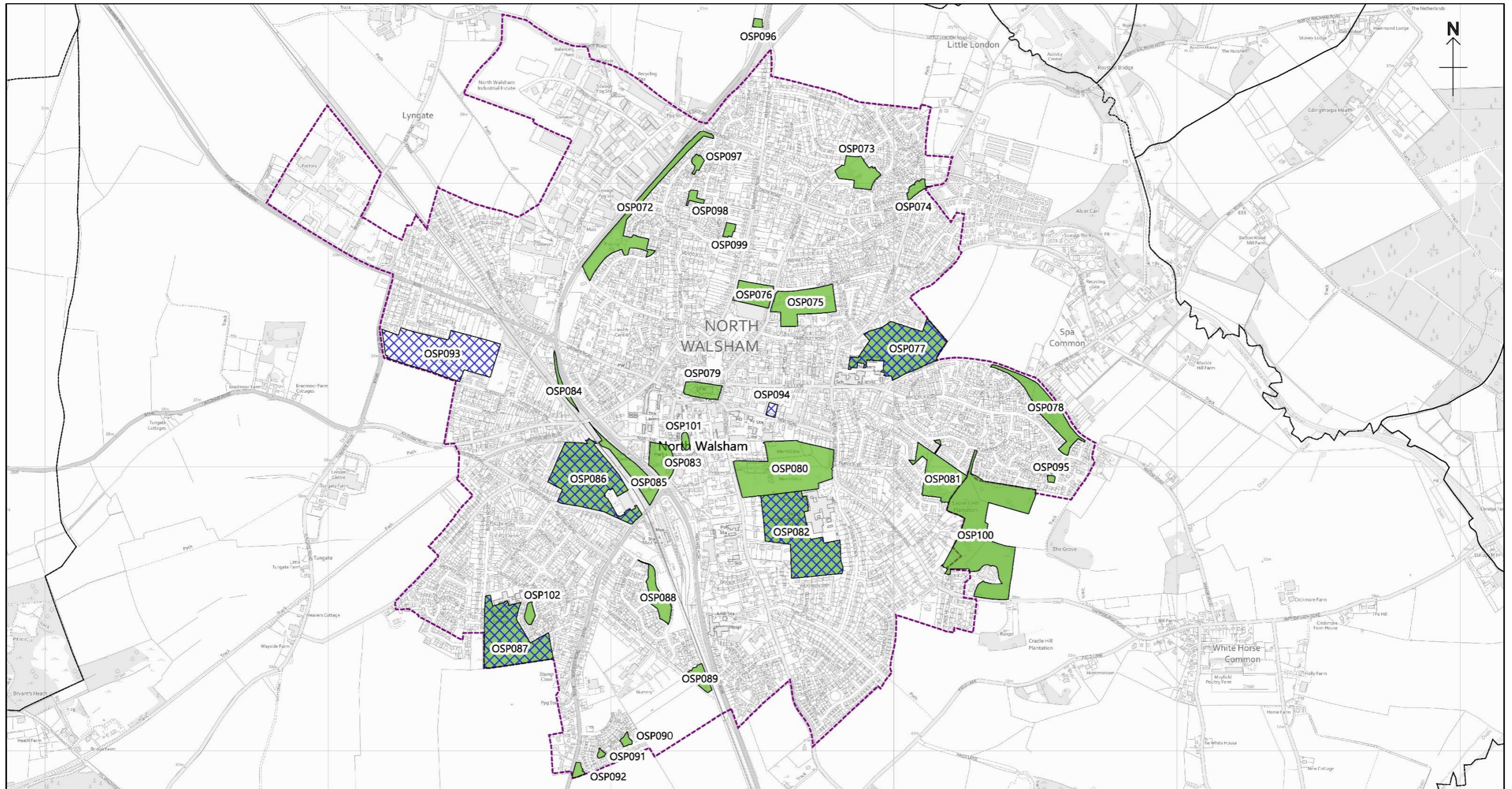
03/12/2020

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
 and database right
 2020
 Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc

Appendix 3: Open Space Designations



North Walsham - Open Spaces (Reg 19)

- Open Land Area
- Local Green Space
- Open Land + Education / Formal Recreation Area
- Parish Boundary
- Education / Formal Recreation Area
- Existing Settlement Boundary

NOT TO SCALE

CB

08/04/2020

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
 and database right
 2020

Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc

Brownfield Land Register Update

Summary: This report provides an update to the Brownfield Land Register 2020.

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

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

1. Introduction

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

2. What is previously developed land?

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

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

3.1 The first part of the register is the list of suitable brownfield land sites and Part 2, a sub-set of Part 1, is for those entries in Part 1 that the authority considers to be suitable for 'permission in principle'². Part 2 of the register is discretionary.

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

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

4. The Register

- 4.1 The North Norfolk Brownfield Land Register (BLR) has been prepared in accordance with the regulations and has been reviewed this year, for publication in December 2020.
- 4.2 In December 2019 the register comprised Ten sites for inclusion in Part 1 of the register, consisting of 6 sites with existing planning permission (either full or outline) and 4 sites without. No sites are/ were proposed for the granting of permission in principle.
- 4.3 This year, 9 of those sites from last year have been considered to be retained on the register, as the circumstances have not changed and one has been removed, as it is no longer available due to its commencement.
- 4.4 In addition to the above, one new sites have been identified for inclusion on the register, which is a new permission, but has not yet commenced and therefore available.
- 4.5 The Government has advised that local authorities should use existing processes to identify sites for inclusion in brownfield land registers. The main source of sites for consideration for the BLR has been the Council's Housing and Economic Land Availability Assessment (HELAA) which includes, but is not limited to, details of unimplemented planning permissions, allocated sites which are unimplemented, sites put forward through a 'call for sites' and land in local authority ownership.
- 2.3 Sites that appear on the register must be appropriate for housing development (or housing led development), irrespective of their planning status, having regard to the criteria³ set out in [regulation 4](#) of the BLRR. Local authorities are also required to have regard to the development plan, including relevant neighbourhood plans, and the National Planning Policy Framework when making decisions about which sites to include on their registers. This means for example that a site that complies with the definition of brownfield land but is located within an area designated as countryside in the development plan would **not** appear on the register.
- 2.4 The list of Brownfield sites have been considered to meet the definition of previously developed land, are a minimum of 0.25ha and are considered to support at least 5 dwellings. They also meet the definitions of suitable, available or achievable as set out in the regulations. The result of this process was the 10 sites have been entered into the register (See APPENDIX A). These sites amount to approximately 6.25 hectares of brownfield land with an estimated net minimum number of dwellings totalling 222.
- 2.5 Part 2 of the register is discretionary, inclusion of a site in Part 1 does not mean that it will automatically be granted permission in principle. The regulations set out the requirements for publicity and consultation where an

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

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

(b) the land is suitable for residential development;

(c) the land is available for residential development; and

(d) residential development of the land is achievable.

authority proposes to enter sites on Part 2 of the register. There is no right of appeal where a LPA decides not to enter a site in Part 2 of the register and not trigger the grant of permission in principle. A person with an interest in a site has the option of submitting a planning application to the LPA in the usual manner.

- 2.7 Permission in principle is an additional tool that the Government has created and it must be carefully considered whether it is beneficial to use it, and if so where. The inclusion of sites on Part 2 of the register is at the Council's discretion and requires a clear, transparent and consistent approach. The regulations stipulate very precisely what matters can be taken into account when granting permission in principle, and which matters cannot. Crucially, unlike normal planning applications it would usually fall to the Council, and not the developer, to undertake any technical surveys necessary to confirm that a site is suitable and developable.
- 2.8 It is considered that there would be very limited gains resulting from establishing and undertaking the process required for sites to be included on Part 2 of the register. Granting of permission in principle would be unlikely to lead to any significant increase in the number dwellings coming forward on brownfield land in the district. It is therefore considered that the resource implications (staff and financial) far outweigh any advantages of undertaking the process of granting sites in the register permission in principle.
- 2.9 Taking into account the above issues it is proposed that the Council does not progress with Part 2 of the register, unless there is an advantage in doing so.

5. Recommendation

- **To publish the Brownfield Register with the 2020 updates.**
- **Agree to the recommended approach not to undertake Part 2 of the register.**

4. Legal Implications and Risks

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

5. Financial Implications and Risks

- 5.1 A new burdens grant payment of £14,645 for 2016/17; £5,485 for 2017/18 and £3,687 for 2018/19, £2,446 for 2019/20. totaling £26,263, has been received by the Council. We anticipate this will be the last New Burdens grant payment for Brownfield Land Registers and Permission in Principle.
- 5.2 The brownfield land register must be reviewed at least once a year and therefore the process requires an ongoing officer commitment.

Abbreviations

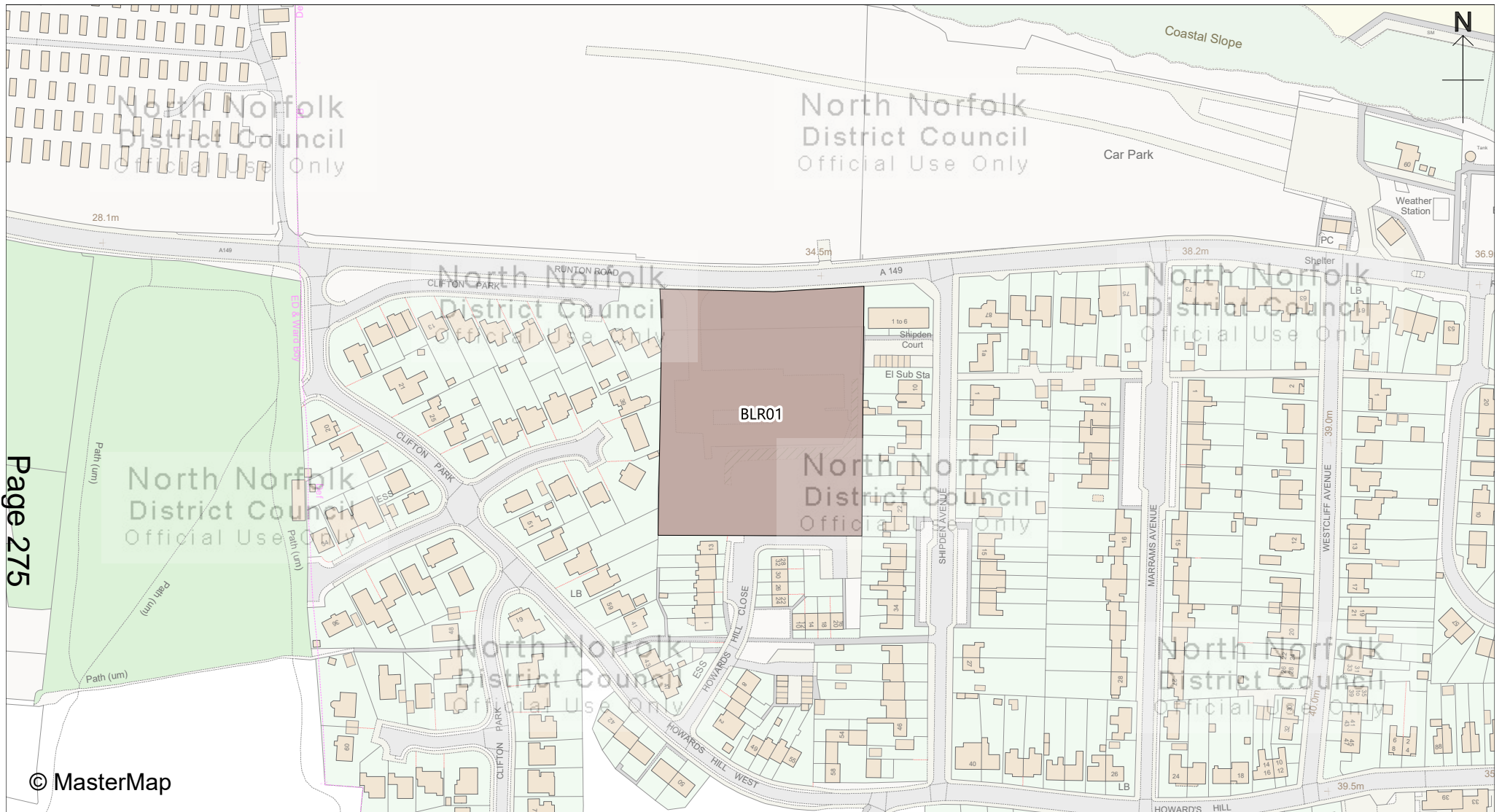
BLRR - The Town and Country Planning (Brownfield Land Register) Regulations 2017

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

DCLG - Department for Communities and Local Government

BLR - North Norfolk Brownfield Land Register

This page is intentionally left blank



North Norfolk Brownfield Land Register (2019)

BLR01 - Land at Runton Road, Cromer

1:2500

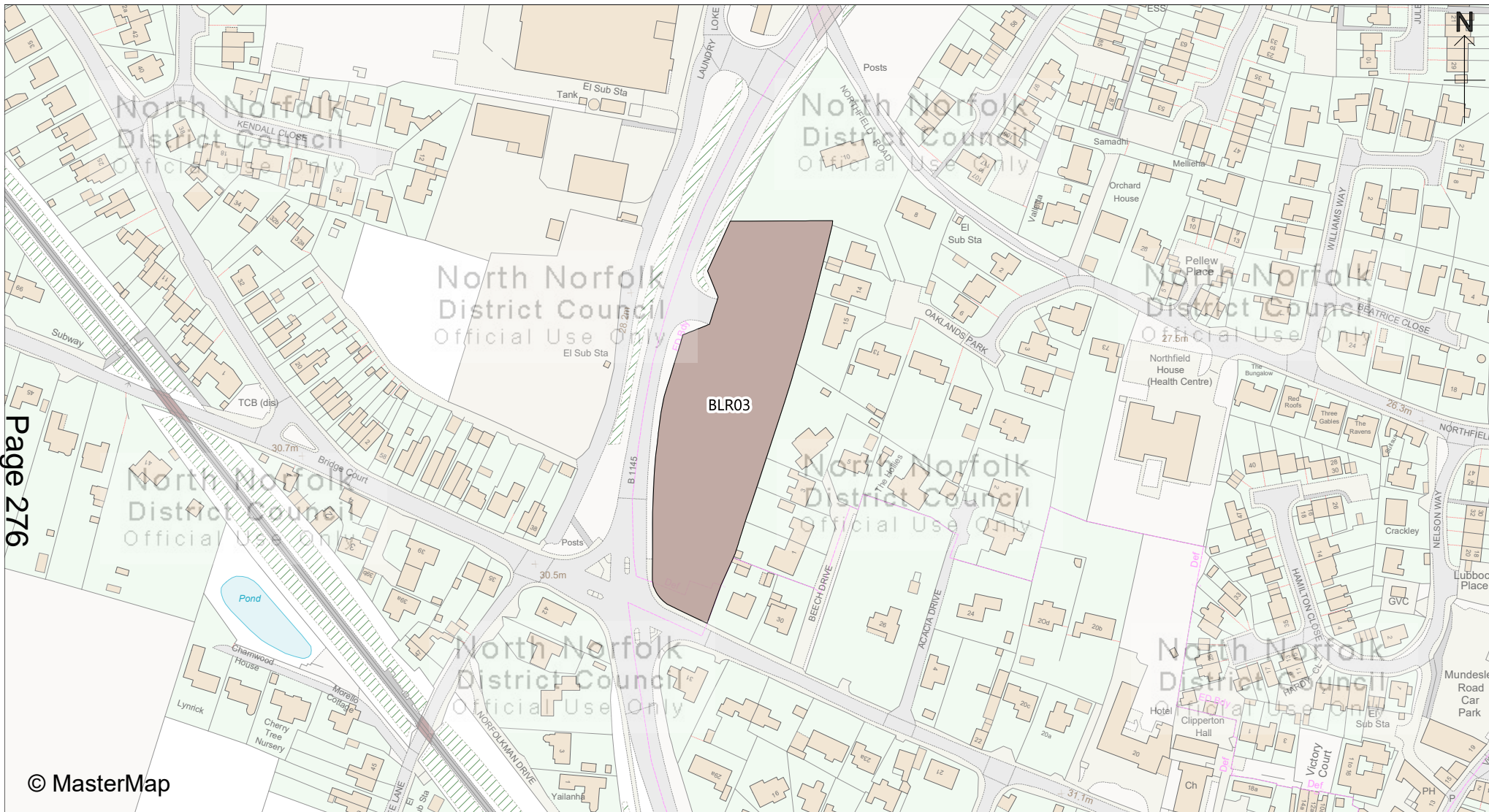
CB

15/11/2019

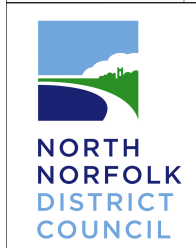
North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
Tel: 01263 513811
Fax: 01263 515042
www.northnorfolk.org

© Crown Copyright
and database right
2019
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



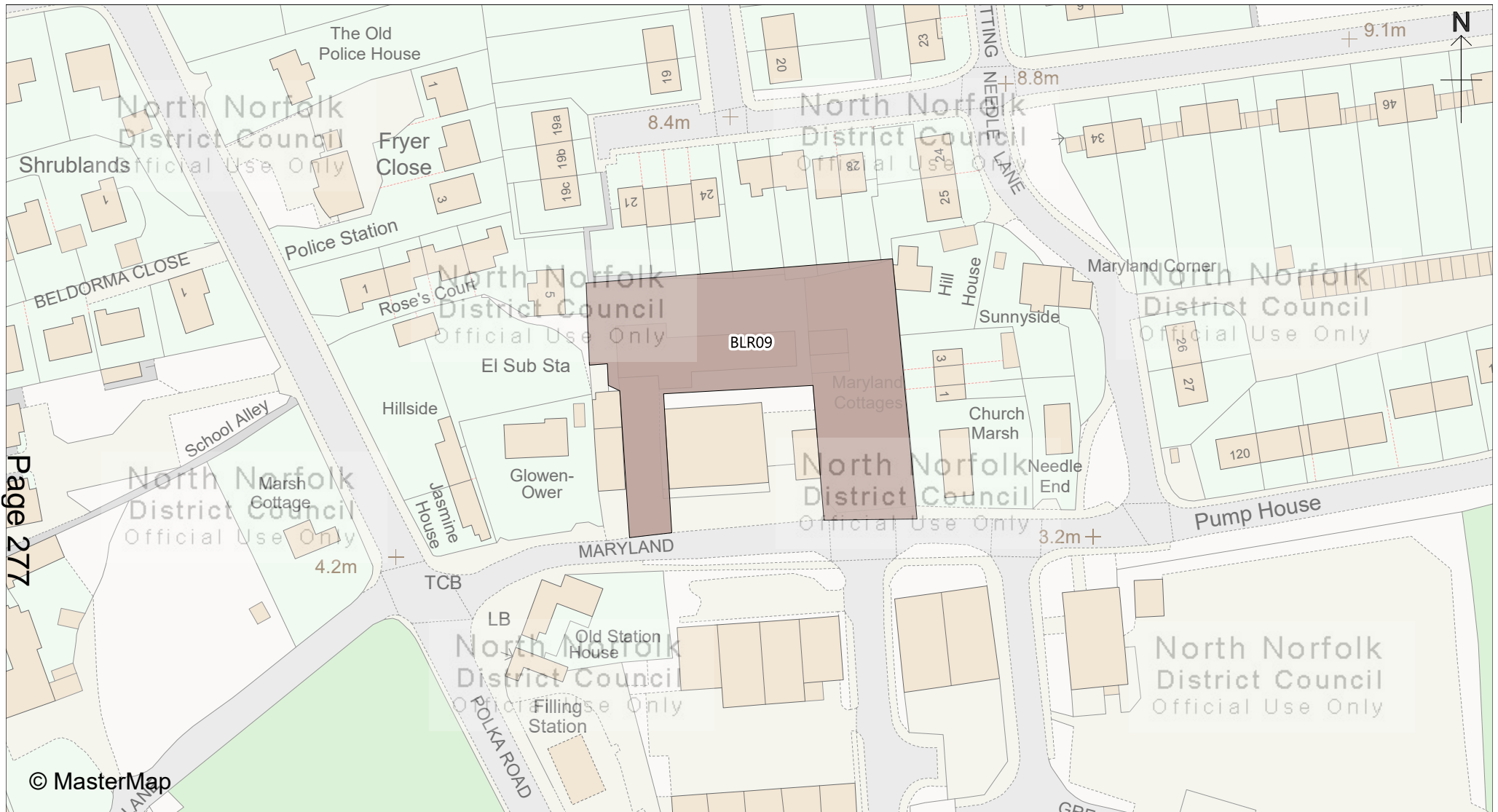
© MasterMap



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

1:2500	CB
15/11/2019	
North Norfolk District Council Council Offices, Holt Road, Cromer, Norfolk, NR27 9EN Tel: 01263 513811 Fax: 01263 515042 www.northnorfolk.org	

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623
 Aerial Photos
 ©Getmapping plc

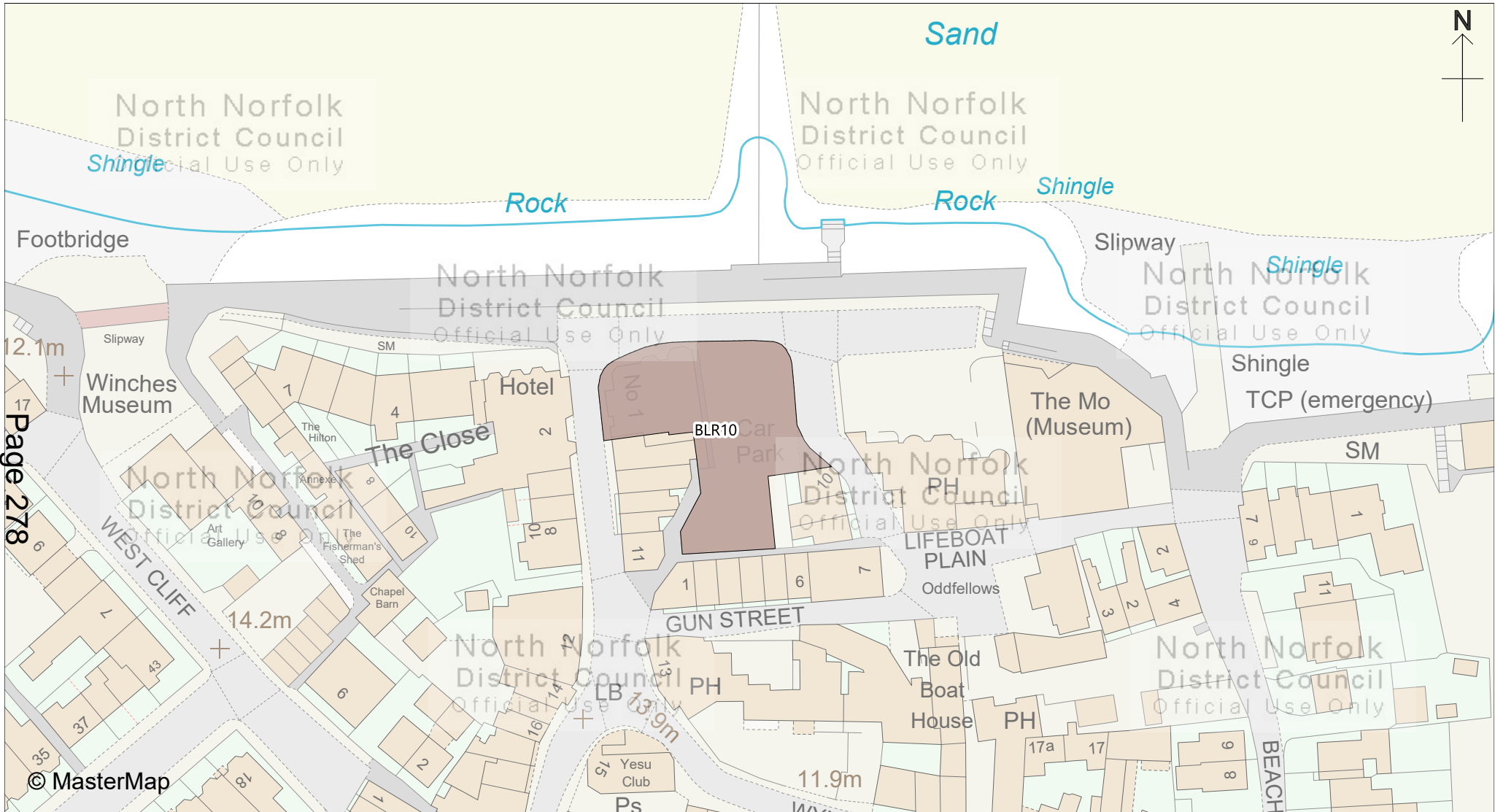


North Norfolk Brownfield Land Register (2019)
 BLR09 - Units at Old Coal Yard, Maryland, Wells-next-the-Sea

1:1250	CB
15/11/2019	

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 Tel: 01263 513811
 Fax: 01263 515042
 www.northnorfolk.org

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623
 Aerial Photos
 ©Getmapping plc



© MasterMap



North Norfolk Brownfield Land Register (2019)

BLR10 - Formerly The Shannocks, 1 High Street, Sheringham

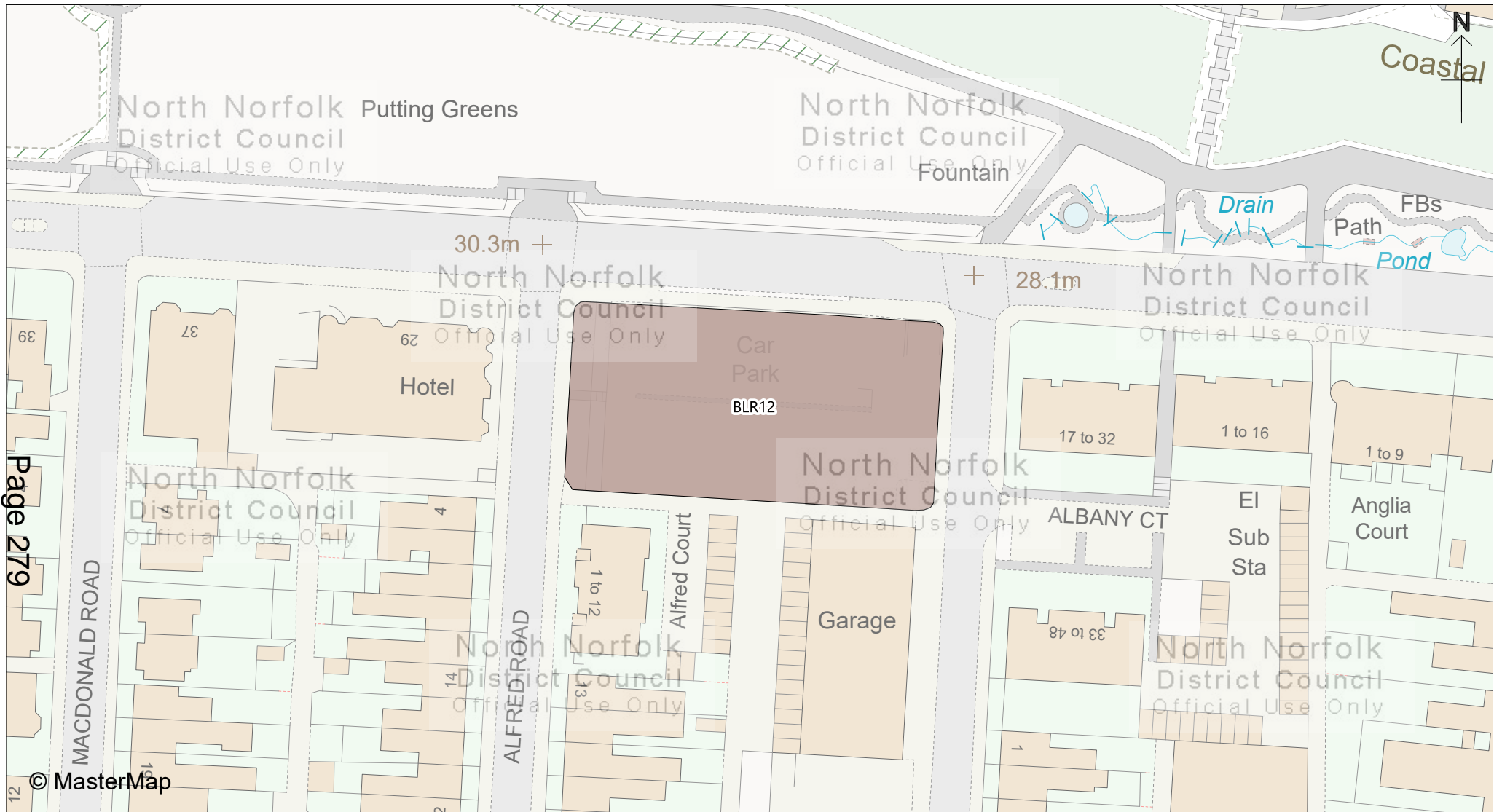
1:1000 CB

15/11/2019

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 Tel: 01263 513811
 Fax: 01263 515042
 www.northnorfolk.org

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc



North Norfolk Brownfield Land Register (2019)

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

1:1000

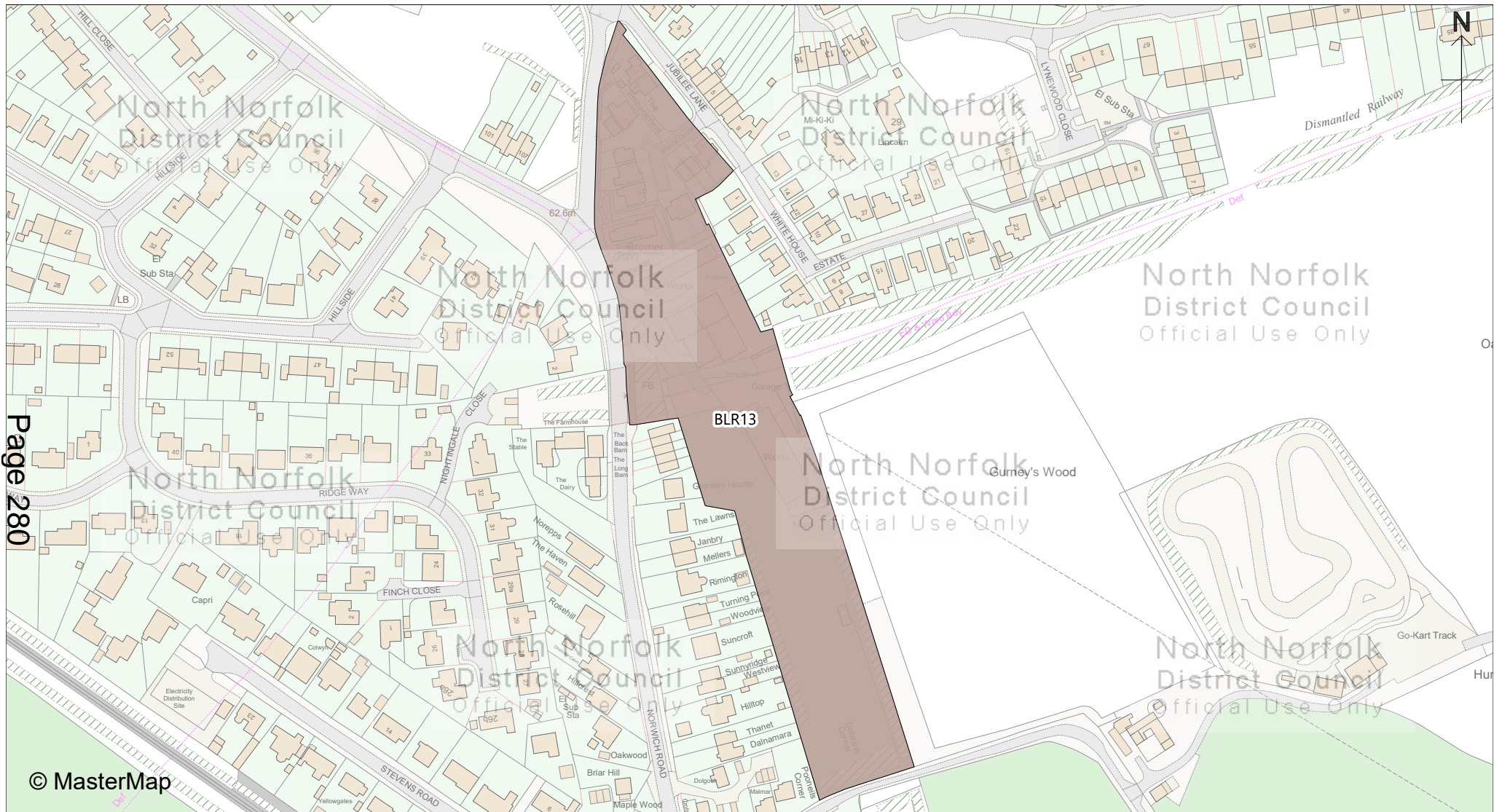
CB

15/11/2019

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 Tel: 01263 513811
 Fax: 01263 515042
 www.northnorfolk.org

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc



Page 280

© MasterMap



North Norfolk Brownfield Land Register (2019)

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

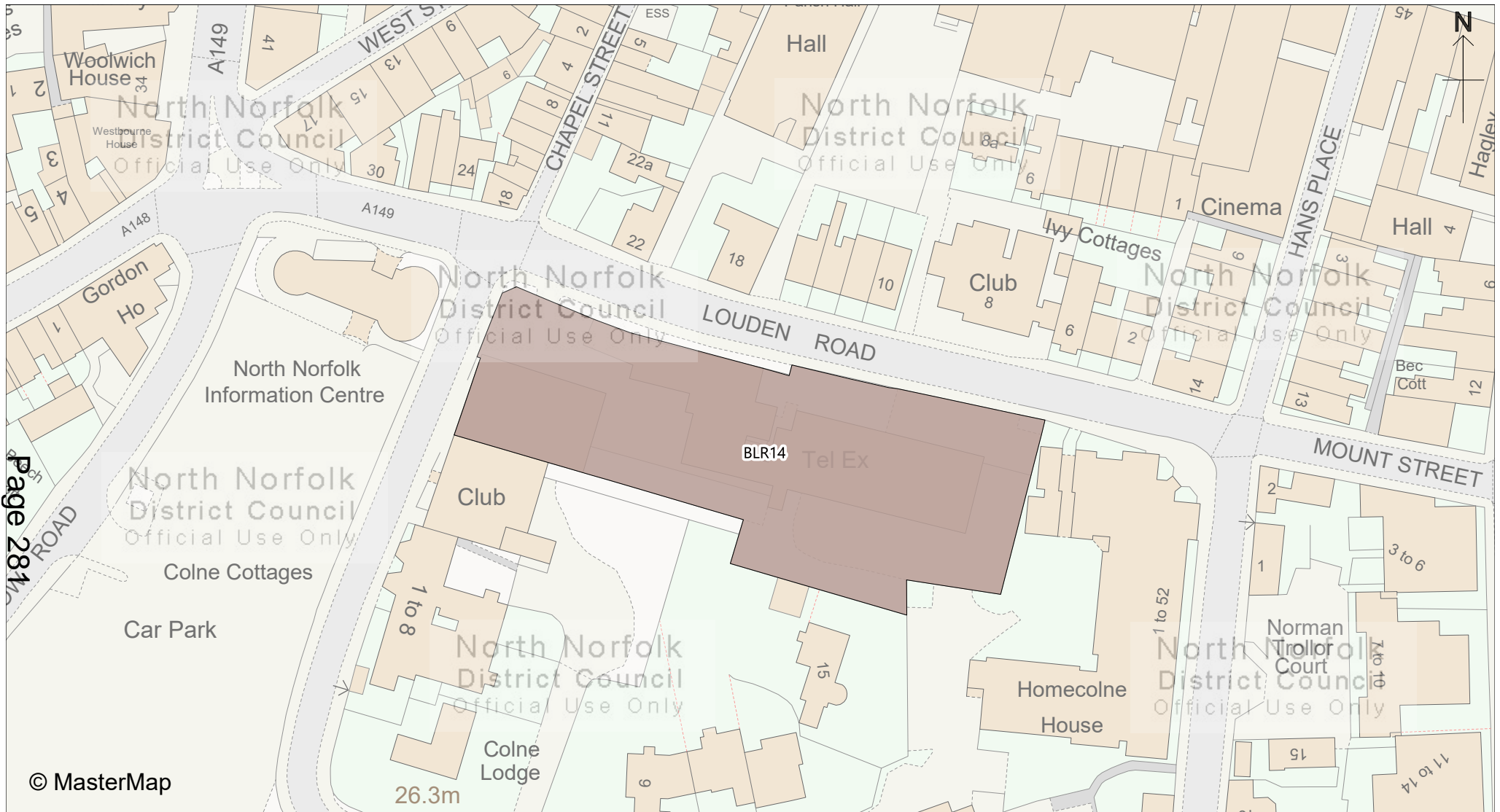
1:2500 CB

15/11/2019

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 Tel: 01263 513811
 Fax: 01263 515042
 www.northnorfolk.org

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc



Page 281

© MasterMap



North Norfolk Brownfield Land Register (2019)

BLR14 - Land South of Louden Road, Cromer

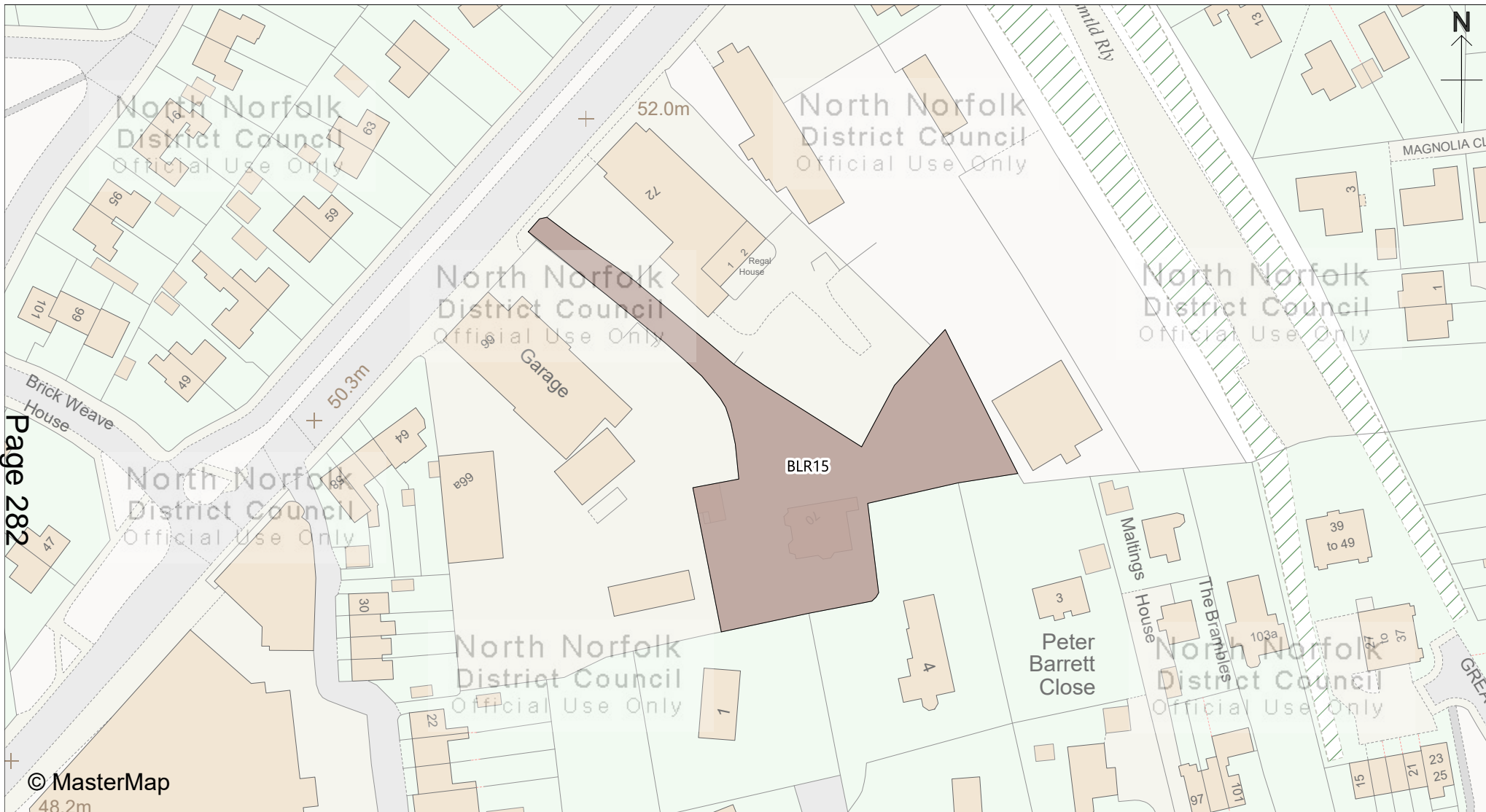
1:1000 CB

15/11/2019

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 Tel: 01263 513811
 Fax: 01263 515042
 www.northnorfolk.org

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc



Page 282

© MasterMap
48.2m



North Norfolk Brownfield Land Register (2019)

BLR15 - 70 Holt Road, Fakenham

1:1250

CB

15/11/2019

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
Tel: 01263 513811
Fax: 01263 515042
www.northnorfolk.org

© Crown Copyright
and database right
2019
Ordnance Survey
100018623

Aerial Photos
©Getmapping plc



Page 283

© MasterMap



North Norfolk Brownfield Land Register (2019)

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

1:2500

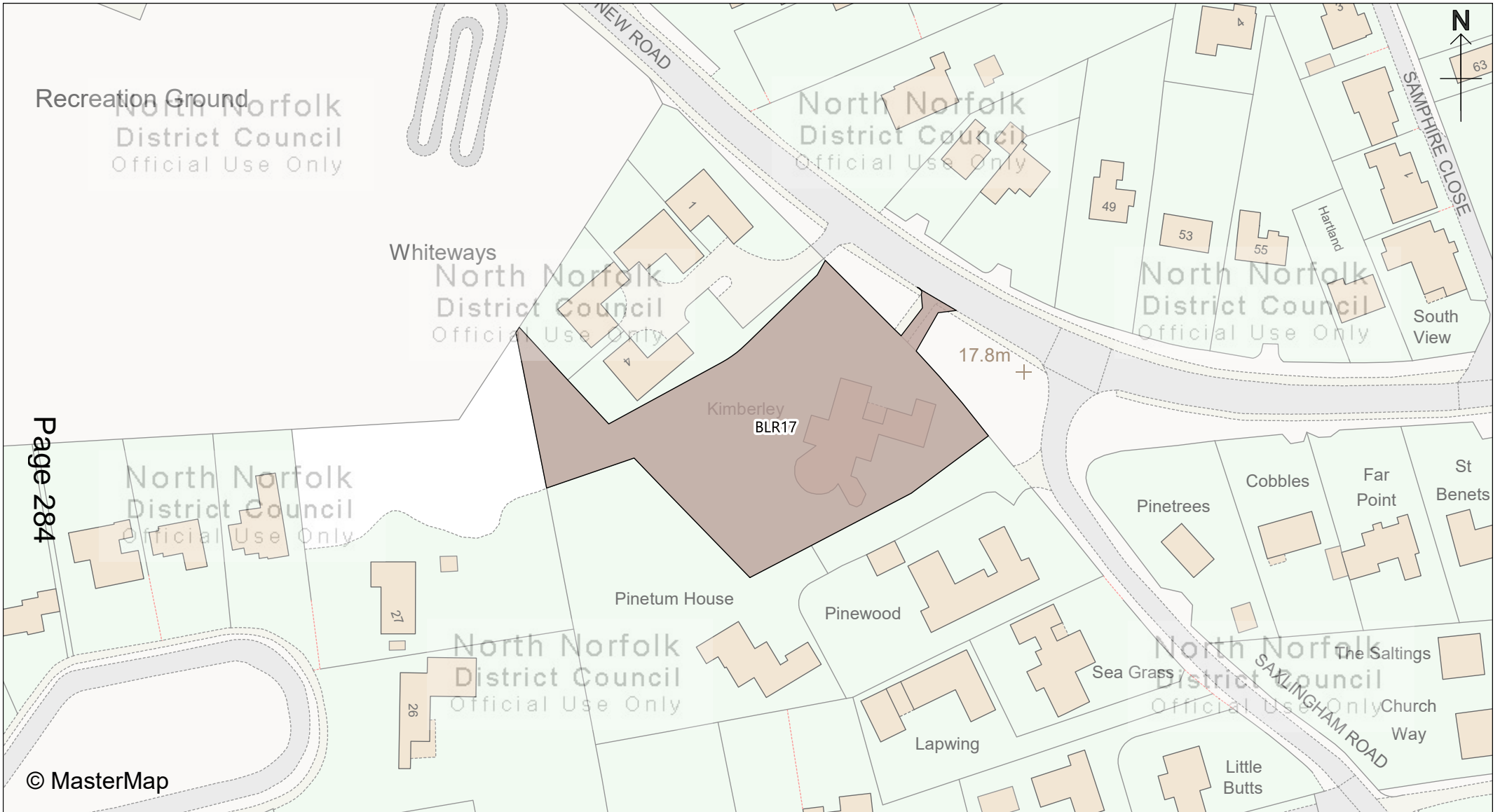
CB

15/11/2019

North Norfolk District Council
 Council Offices, Holt Road,
 Cromer, Norfolk, NR27 9EN
 Tel: 01263 513811
 Fax: 01263 515042
 www.northnorfolk.org

© Crown Copyright
 and database right
 2019
 Ordnance Survey
 100018623

Aerial Photos
 ©Getmapping plc



Recreation Ground
North Norfolk
District Council
Official Use Only

North Norfolk
District Council
Official Use Only

Whiteways
North Norfolk
District Council
Official Use Only

North Norfolk
District Council
Official Use Only

North Norfolk
District Council
Official Use Only

North Norfolk
District Council
Official Use Only

North Norfolk
District Council
Official Use Only

Page 284

© MasterMap



North Norfolk Brownfield Land Register (2019)

BLR17 - Kimberley, New Road, Blakeney

1:1250

CB

20/11/2020

North Norfolk District Council
Council Offices, Holt Road,
Cromer, Norfolk, NR27 9EN
01263 513811
www.north-norfolk.gov.uk

© Crown Copyright
and database right
2020

Ordnance Survey
100018623

Aerial Photos
©Getmapping plc

Reference	Application No.	Address	Source	Description	Description/ Location
BLR01	PO/06/0629	Land at Runton Road, Cromer.	Outstanding permissions.	Estimated capable of accommodating between 25-29 dwellings.	Land at Runton Road, Cromer. (No. of unites based on 40/ha)
BLR03	None	Maces Yard, 34-36 Cromer Road, North Walsham.	Call for sites.	Estimated capable of accommodating between 20-23 dwellings.	Maces Yard 34 - 36 Cromer Road North Walsham. (No. of unites based on 40/ha)
BLR09	PF/17/1939	Units at Old Coal Yard, Maryland, Wells-next-the-Sea.	Outstanding permissions.	Not Commenced. Full permission for 9 dwellings. Expires 16/08/2021.	Demolition of grain store & erection of dwellings. Units at Old Coal Yard, Maryland, Wells-next-the-Sea.
BLR10	PF/17/0468	Formerly The Shannoeks, 1 High Street, Sheringham.	Outstanding permissions.	Not Commenced. Full permission for 10 dwellings. Expires 06/02/2021.	Demolition - New Dwelling Formerly The Shannoeks, 1 High Street, Sheringham.
BLR12	C01	Land adjacent to East Coast Motors, Beach Road, Cromer.	Allocation.	Allocation for 40 dwellings.	Land adjacent to East Coast Motors, Beach Road, Cromer
BLR13	C07	Land at Jubilee Lane / Cromer High Station, Cromer.	Allocation.	Allocation for 31 dwellings.	Land at Jubilee Lane / Cromer High Station. Cromer
BLR14	ROS4	Land South of Louden Road, Cromer.	Allocation.	Allocation for 20 dwellings.	Land South of Louden Road, Cromer.
BLR15	PF/11/0487	70 Holt Road, Fakenham.	Outstanding permissions.	Site is not being progressed.	Replacement Dwelling 70 Holt Road, Fakenham.(Net Gain 5).
BLR16	PO/15/0539	Land to the north of Tilia Business Park, Tunstead Road, Hoveton.	Outstanding permissions.	Not Progressed. Outline permission for 28 dwellings. Expires 17/10/2020.	Residential Development Land to the north of Tilia Business Park, Tunstead Road, Hoveton.
BLR17	PF/19/1976	Kimberley, New Road, Blakeney.	New Permission.	Not Commenced. Full permission for 6 dwellings. Expires 13/03/2023.	New Dwelling Kimberley, New Road, Blakeney. Demolition of dwelling & replacement with 7 dwellings. (Net Gain 6).

