

# Planning Policy & Built Heritage Working Party



**Please contact:** Linda Yarham

**Please email:** [linda.yarham@north-norfolk.gov.uk](mailto:linda.yarham@north-norfolk.gov.uk)

**Please Direct Dial on:** 01263 516019

Friday, 12 February 2021

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held remotely via Zoom on **Monday, 22 February 2021 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](mailto: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 G Mancini-Boyle, 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](mailto:districtcouncil@north-norfolk.gov.uk) **Web site** [www.north-norfolk.gov.uk](http://www.north-norfolk.gov.uk)

## A G E N D A

**1. APOLOGIES FOR ABSENCE**

**2. PUBLIC QUESTIONS**

**3. MINUTES**

(Pages 1 - 6)

To approve as a correct record the Minutes of a meeting of the Working Party held on 18 January 2021.

**4. ITEMS OF URGENT BUSINESS**

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

**5. DECLARATIONS OF INTEREST**

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

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

**7. LOCAL PLAN DRAFT POLICY HOU1: HOUSING TARGETS**

(Pages 7 - 70)

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final version of **Policy HOU1 – Housing Target for Market and Affordable Homes.**

Recommendations: **A. That the Authority uses the 2016 based National Household Projections as the starting point for deriving a Local Plan Housing Target**  
**B. That the Plan includes a target to deliver a minimum of 460 dwellings on average in each year of the Plan period.**  
**C. That the Plan includes policies and proposals which will ensure that more than the minimum target, and up to 560 new dwellings per year, could be delivered.**  
**D. That Working Party recommends revised Policy HOU1 to Cabinet.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	

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

**8. LOCAL PLAN DRAFT POLICY APPROACHES TO HOUSING STANDARDS** (Pages 71 - 126)

**Summary:** This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse a number of policy approaches concerning matters of sustainable development.

**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:**

**HOU8: Accessible and Adaptable Properties;**  
**HOU9: Minimum Space Standards;**  
**HOU10: Water Efficiency;**  
**HOU11: Sustainable Construction, Energy Efficiency & Carbon Reduction.**

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

**9. LOCAL PLAN DRAFT POLICY APPROACHES TO SUSTAINABLE DEVELOPMENT** (Pages 127 - 190)

**Summary:** This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse a number of policy approaches concerning matters of sustainable development.

**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:**

**SD13: Pollution & Hazard Prevention and Minimisation;**

**SD14: Transport Impact of New Development;**  
**SD15: Parking Provision;**  
**SD16: Electric Vehicle Charging;**  
**SD17: Safeguarding Land for Sustainable Transport.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
<p>Contact Officer, telephone number and email:</p> <p>Caroline Dodden, Senior Planning Officer, 01263 516310  <a href="mailto:Caroline.dodden@north-norfolk.gov.uk">Caroline.dodden@north-norfolk.gov.uk</a></p> <p>Iain Withington, Planning Policy Team Leader, 01263 516034  <a href="mailto:Iain.Withington@north-norfolk.gov.uk">Iain.Withington@north-norfolk.gov.uk</a></p>	

**10. LOCAL PLAN UPDATE - REMAINING POLICIES AND APPROACH TO CLIMATE CHANGE**

The Working Party will be updated verbally.

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

**12. EXCLUSION OF PRESS AND PUBLIC**

To pass the following resolution (if necessary):

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

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

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

## PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Monday, 18 January 2021 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 G Mancini-Boyle  
Mr N Pearce Mr J Toye

Mrs A Fitch-Tillett (in place of Dr C Stockton)

**Members also attending:** Mrs W Fredericks  
Mr N Housden  
Mr R Kershaw  
Mr J Rest

**Officers in Attendance:** Planning Policy Manager, Democratic Services Manager and Democratic Services & Governance Officer (Regulatory)

### 64 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors J Punchard and Dr C Stockton. One substitute Member was in attendance as shown above.

### 65 PUBLIC QUESTIONS

None.

### 66 MINUTES

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

### 67 ITEMS OF URGENT BUSINESS

None.

### 68 DECLARATIONS OF INTEREST

<u>Minute</u>	<u>Councillor</u>	<u>Interest</u>
70	A Brown	Involved in the preparation of the Corpusty & Saxthorpe Neighbourhood Plan (as Parish Councillor)
70	Mrs A Fitch-Tillett	Resident of Overstrand but designation does not affect her property

Councillor P Fisher stated that he was the Ward Member for Wells (Minute 71).

### 69 UPDATE ON MATTERS FROM THE PREVIOUS MEETING (IF ANY)

None.

## **70 LOCAL PLAN DRAFT SETTLEMENT BOUNDARIES FOR SMALL GROWTH VILLAGES**

The Planning Policy Manager presented a report that recommended the inclusion in the Local Plan of revised settlement boundaries around each of the Small Growth Villages.

The Chairman requested that the settlement boundary identified in the Corpusty & Saxthorpe Neighbourhood Plan be used as the Local Plan settlement boundary for Corpusty. He requested clarification as to how the Local Plan would be consulted upon and the approximate timescale.

The Planning Policy Manager explained that development boundaries that had been identified in existing or emerging Neighbourhood Plans would generally be used as a policy tool. He explained that the Local Plan was currently a working draft and would be revised prior to consultation. He stated that plans for Corpusty would be included, and a clear explanation given of the status of Neighbourhood Plans and how boundaries were defined in them.

With regard to the consultation process, it was expected that the review of the remaining policies would be completed by the middle of the year, with a working target of July to commence consultation. However, there was a great deal of work required to meet that target. The development boundaries would be published as a separate background paper and referred to in the Local Plan document and publicity material. A number of background papers would be published to provide the reasoned justification and supporting evidence for the key policy approaches.

Councillor Mrs A Fitch-Tillett commented on the extended boundary for Overstrand around the garden centre. She considered that the land should be used for employment, and asked why the land immediately to the east of the garden centre had not been included within the boundary.

The Planning Policy Manager explained that the Planning Policy Team had followed a methodology in drawing up the settlement boundaries. The garden centre was part of the built up fabric of the village and its inclusion on those terms was reasonable. If built up areas such as garden centres were excluded, it would possibly mean excluding other facilities that were part of the structure of the village, which would be a different approach to the one that had been taken. He considered that it would be best to take a view based on the responses to the Regulation 19 consultation. There would be an opportunity to make modifications to the Plan if necessary between the Reg. 19 consultation and submission for examination and to request that the Inspector considers those modifications.

Councillor N Dixon requested clarification of the existing and proposed boundaries for Badersfield as he could not see any difference between them.

The Planning Policy Manager explained that there were some settlements where there had been little or no change that would justify moving the boundaries, and therefore the existing boundary had been used. He explained that boundary lines were not as critical as they had been in the past as the policies would allow more flexibility to develop outside the boundary where proposals were adjacent or closely related to the settlement.

Councillor Dixon considered that the document was confusing and it would be better to state that the future boundary would remain as already established.

The Planning Policy Manager agreed that it would be a useful amendment. He suggested that 'retain existing boundary as formerly defined' would be better terminology which would focus attention on the modifications instead of trying to amend the existing boundaries. He confirmed that the amendment would be made prior to consultation and stated that there would need to be significant changes to the consultation document to make it easier for the public to understand.

Councillor J Toye asked if the revised boundaries would be brought back before the Working Party prior to consultation, bearing in mind the timescales.

The Planning Policy Manager explained that he was seeking delegated authority to make the amendments so there would be no requirement to bring them back before the Working Party prior to consultation.

The Chairman referred to a planning application that had been refused at a recent meeting of the Development Committee as the site lay just outside the development boundary for North Walsham, which may have been acceptable under the new policy. An appeal decision was awaited on another site outside the development boundary of Holt.

Councillor J Rest asked if the boundary changes were likely to open up opportunities for developers to resubmit previously refused schemes. He had in mind a large scheme at Sculthorpe that had been refused.

The Planning Policy Manager explained that the approach would apply only to the Growth Villages and be subject to a caveat that there could be no more than 6% housing growth over the existing number of dwellings. The number of completions would be monitored. All proposals, regardless of location, would have to meet all other criteria, such as design, highways, landscape etc. It would provide modest opportunities for infill or rounding off on sites adjacent to the development boundary. It would not open up large scale development opportunities around towns and villages, such as the Sculthorpe proposal. There was a risk that this policy approach could lead to unsuitable proposals coming forward, but it would be for the Development Committee to consider and make a reasoned judgement.

Councillor Mrs P Grove-Jones referred to a site at Catfield on the former mushroom farm, part of which the Parish Council would like to see developed for residential use. She asked if it could be argued under this policy.

The Planning Policy Manager explained that the site in question would continue to be designated as employment land in the new Plan. Although the Parish Council considered that there was a good case for residential development, the employment designation was a key policy hurdle and this policy approach would not affect it. It was a matter for an applicant to make a case to the Development Committee that the benefits of residential development outweighed the loss of employment land. It was not a matter for the Working Party to consider.

Councillor N Dixon considered that the reference to Tunstead Road in relation to Horning was incorrect. The Planning Policy Manager stated that he would check prior to publication.

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

## **RECOMMENDED**

- 1. That Cabinet agree the settlement boundaries for the Small Growth Villages as a basis for Regulation 19 consultation and inclusion in the new Local Plan.**
- 2. That Cabinet gives delegated authority to the Planning Policy Manager to produce boundaries for Sea Palling, Walcott and Potter Heigham in accordance with the methodology.**

### **71 LOCAL PLAN OPEN LAND AREA DESIGNATIONS - WELLS-NEXT-THE-SEA**

The Planning Policy Manager presented a report in respect of additional open land designations at Wells-next-the-Sea.

The Chairman stated that the site photographs at page 93 and 94 of the report should be numbered AGS/WEL22.

The Planning Policy Manager referred to representations that had been submitted by Mr Peter Terrington, which had been circulated to the Working Party, in support of the designation of the three areas of land that had been identified in the report. Whilst Mr Terrington had acknowledged that two of the sites did not qualify for designating as Open Land Areas, he had requested that other controlling mechanisms, such as Article 4 Directions, be applied to those sites. The Planning Policy Manager explained that Article 4 Directions were used to limit specific types of development that would otherwise be permitted and could be applied at any time. He advised the Working Party that it was not appropriate to consider them in relation to Local Plan preparation. He offered to prepare a separate report for the Working Party with regard to Article 4 Directions if required. The development potential of the two sites in question was already limited as they were subject to other policy constraints, being within the AONB, Conservation Area and high flood risk area. He stated that he would write to Mr Terrington following the meeting.

Councillor P Fisher, the local Member, reported that the Town Clerk had indicated support for the recommendation to designate the site opposite the sailing club and that there were no issues with the other sites that were not recommended.

At the request of the Chairman, the Planning Policy Manager expanded further on the background to Article 4 Directions.

Councillor Mrs P Grove-Jones asked if restrictive covenants were a limiting factor.

The Planning Policy Manager explained that restrictive covenants were separate legal controls that were nothing to do with the Local Planning Authority and could only be enforced by the person that had imposed them. Often there was an overlap with planning conditions, which were enforceable by the Local Planning Authority.

The Planning Policy Manager presented the recommendation as set out in the report. He suggested that a training event for all Members on the broader issue of planning controls, to include Article 4 Directions, might be appropriate. The Working Party supported this suggestion.

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



**RECOMMENDED** unanimously

**That Cabinet includes the additional Open Land Area Designation for site WEL22 (Wells East Quay) in the Local Plan.**

The meeting ended at 11.04 am.

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Chairman

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## Local Plan Draft Policy HOU1: Housing Targets

Summary: This report considers the representations made at Regulation 18 stage of plan preparation and seeks to agree the final version of **Policy HOU1 – Housing Target for Market and Affordable Homes**.

Recommendations:

- A. That the Authority uses the 2016 based National Household Projections as the starting point for deriving a Local Plan Housing Target
- B. That the Plan includes a target to deliver a minimum of 460 dwellings on average in each year of the Plan period.
- C. That the Plan includes policies and proposals which will ensure that more than the minimum target, and up to 560 new dwellings per year, could be delivered.
- D. That Working Party recommends revised Policy HOU1 to Cabinet.

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

### 1. Introduction

1.1 The emerging North Norfolk Local Plan has been subject to public consultation at Regulation 18 Draft Plan stage during May and June 2019. This report is one of a number of reports that seeks to finalise the draft Local Plan policy approaches. 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 the examination stage the Plan will be subject to consideration by an independent inspector against a number of legal and soundness tests to determine if it is legally compliant, justified, effective, and has been positively prepared. A binding report is produced by the Inspector, which will determine if the 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 the Regulation 18 consultation feedback, to seek Members endorsement of the final version of **Policy HOU1** ahead of the Regulation 19 consultation and then submission of the Plan. The Policy relates to the *quantity* of homes to be provided, both in

terms of the overall total for the District as a whole, the numbers of affordable dwellings, and the quantity proposed in each settlement.

## **2. Background and Update**

- 2.1 Establishing a final housing target for the Local Plan is critically important. The formal target which is set in the Plan is expressed as a minimum number of dwellings to be provided. It not only ensures that the Plan can provide for sufficient homes, it is also the figure which is used in the Five Year Land Supply process and to assess delivery performance under the Housing Delivery Test.
- 2.2 National policy is very clear in its expectations that a *sound* and *positively prepared* plan must provide for sufficient homes and that the strategy should ensure regular delivery of the required homes over at least a fifteen-year period. Plans should separately set out targets for affordable homes. A Plan that fails to provide for sufficient homes, of the right types, is likely to be found unsound and fail at examination.
- 2.3 Over the period of Plan preparation, the way in which authorities should establish what constitutes 'sufficient', (referred to as the housing 'requirement'), has been subject to successive reviews. The underlying requirement is that the plan should meet all likely future need and demand based on objective evidence. To establish this the NPPF requires the use of a standard national methodology to calculate how many homes will be needed. In recent years the inputs into this methodology have been subject to change. Members may recall that the recent consultation on the Planning White Paper outlined further potential revisions which if introduced would have had significant implications for plan preparation in North Norfolk and would have increased the housing requirement in the District derived via the standard methodology from around 552 dwellings per year, to in the region of 730 dwellings per year. This would have essentially necessitated the preparation of a new Plan and would have probably set the process back by at least two years, or perhaps longer.
- 2.4 In late December, government indicated it did not intend to introduce these changes and instead confirmed it would retain the approach that had been in place before the White Paper was published.

## **3. The 'requirement' and 'target' explained**

- 3.1 Housing targets included in Local Plans must be based on evidence about the likely future need and demand for homes in the area and should be expressed as a minimum to be provided over the Plan period. Each Authority is expected to produce a Plan which fully addresses this need, unless there is evidence that to do so would result in unsustainable growth. North Norfolk is preparing a Plan covering the period 2016-2036.
- 3.2 In terms of evidence of likely future need, all recent approaches to establishing the housing requirement start with nationally produced population and household growth forecasts. These are published every two years and produce long-term projections for each district. Although projections with a base date of both 2016 and 2018 are available, the standard national methodology currently requires that the 2014 based projections are used.

- 3.3 In many areas, including North Norfolk, the two more recent projections produce lower future rates of growth. None of these projections, applied in isolation, is consistent with the governments overall ambition to deliver around 300,000 homes per year across the country – they all project lower growth. For this reason, to establish the housing requirement for Local Plan purposes, the standard methodology requires that the base projection (the 2014 household projection) is subject to an uplift, with the size of the uplift determined by local affordability ratios (the relationship between local house prices and local incomes). Finally, in areas where the size of the uplift is very large the resulting figure is capped so that no area is expected to add more than a 40% uplift to the total. Following this process across the country results in the individual authority requirements adding up to the 300,000 homes per year the government aims to deliver.
- 3.4 Following this process in North Norfolk, the standard national methodology produces an annual requirement of **552** new dwellings per year. This figure was used as a basis for preparing the Regulation 18 consultation version of the Draft Plan, which over the twenty-year period covered, provided for the delivery of around 11,500 dwellings (575 per year).

#### 4. The Draft Policy and Feedback from Regulation 18 consultation

- 4.1 Draft Policy HOU1 set a minimum housing target over the plan period of between 10,500 and 11,000 new dwellings. The policy explains how the overall figure would be delivered via existing commitments (built and planning permissions), future windfall developments, and the new site allocations proposed in each of the selected growth settlements. Over all the draft Plan published at Reg 18 stage included policies and site allocations which were designed to deliver around 11,500 dwellings, of which at least 2,000 were to be affordable homes. The policy and the explanation for this target is reproduced in **Appendix 1** with track changes marked to reflect the recommendations in this report. **Table A** below is the latest available data based on completions of dwellings up to April 2020, planning permissions granted up until January this year, and revised expectations around delivery on the proposed allocations reflecting recent working party decisions. This shows that the proposals in the draft Plan could deliver around 11,300 dwellings of which around 39% have already been built or have planning permission.

**Table A – Expected Housing Delivery in Draft Reg 18 Plan – Updated with data on new permissions and completions**

	A	B	C	D
Settlement	Dwellings With Planning Permission at 20/01/2021	Dwelling Completions (01/04/16 - 31/03/20)	Proposed New Allocations	Total Growth (2016 - 2036)
North Walsham	90	374	2,150	2633
Fakenham	1136	194	688	2034
Cromer	195	137	557	896

Large Growth Towns

Small Growth Towns	Holt	260	252	227	747
	Sheringham	192	123	135	459
	Stalham	66	88	150	304
	Wells-next-the-Sea	35	79	80	202
	Hoveton	28	4	150	183
Large Growth Villages	Briston & Melton Constable	91	33	80	208
	Mundesley	12	59	30	101
	Blakeney	15	19	30	64
	Ludham	11	2	40	53
Small Growth Villages	Villages named in Policy SD3	187	261	400	859
Remainder of District	All remaining settlements and countryside	253	316	0	629
Windfall Development 2016-2036 Across	Entire District				2025
		2,571	1,941	4,717	11,397

4.2 All of the Regulation 18 consultation feedback has been published in the Schedule of Responses previously reported to Members. The summary feedback for Policy HOU1 is contained within **Appendix 2**.

4.3 There were a total of 60 representations relating to this policy, many of which are lengthy and take the opportunity not only to comment on the policy itself but also raise aspects of the wider development strategy. Many of these wider issues have been reported as each relevant policy area has been considered. The key comments and issues raised in relation to the draft target were:

- *That the overall housing target in the Plan is too high.*- these representations tend to be related not just to the overall target but are also linked to proposals for individual sites and their localised impacts. There is a desire to protect the character of North Norfolk and a wide spread view that there is inadequate infrastructure to support the proposed level of growth. Empty homes, second homes, and many homes for sale, and concerns that further development will not mitigate the impacts of climate change are all cited as reasons to reduce the amount of development.
- *That the housing target is too low.*- There is some acceptance and acknowledgement from the development industry that the authority has followed the requirements of the standard methodology in deriving the housing requirement but the case is nevertheless made for further development in order to meet the governments objectives of delivering more homes. This argument is also linked to the merits of individual sites which are argued to be suitable and, in the context of housing targets being expressed as minimums, should be released for development.
- *That the totals proposed in individual settlements are either too high or too low* – this is similar to those issues outlined above but the case is made in relation to individual settlements, their proposed position in the settlement hierarchy and their capacity to accommodate more or less development.
- *That the numbers proposed are unlikely to be delivered or that the Plan will not ensure a five year land supply.*- it is argued that although the numbers in the Plan might comply with the requirements of the national

methodology the Plan should nevertheless propose more development for a variety of reasons including that some sites may not deliver, the Plan includes too much development on uncertain sources of supply (windfall), that the large proposal at North Walsham will be complex and difficult to deliver, and therefore either reserve sites or a delivery buffer should be incorporated.

## 5. Setting a final Target

5.1 As outlined above the way in which the housing requirement should be calculated is laid down in national guidance and must be derived from the National Population and Household projections. These projections are published on a roughly bi annual basis and produce separate figures for every authority area in the country. They are trend-based projections which model how the need for homes is likely to change taking account of a wide range of factors including birth rates, death rates, migration trends, changes in household size, age profiles, longevity, and all other demographic factors which are likely to influence the need for homes in each separate local authority area. By the end of the period covered in the Local Plan (2036) the three latest national projections produce some significant variations in results. All, however, show the population increasing over the period by between 7 - 11% mainly as a result of continued migration into the District. A recent slowing down in expected future growth shown in the two more recent projections can largely be attributed to reducing fertility rates (a function of an older population), reduced migration expectations, and a slowing down in the increases in longevity.

**Table 1. Recent National Projections of Household Population in North Norfolk**

Base Year of Projection	Estimated Household Population in 2016	Projected Household Population in 2036	Increase in household Population over plan period 2016-36
2014	101,244	112,545	11,301
2016	100,912	108,693	7,781
2018	100,908	111,535	10,627

5.2 Despite now being six years old, national guidance currently requires that the 2014 Household Projection is used as the starting point for calculating the housing requirement. The 2014 based figures produce higher requirements than either of the more recent projections, and substantially higher than the 2016 based projection.

5.3 For some time North Norfolk has made the case in planning appeals that the 2014 based projection is an unreliable starting point from which to determine future growth in the District. In addition to being six years old, the projection has been shown to have over-estimated previous migration rates and therefore it projects forwards from an inflated starting point. The error is substantial and amounts to an over estimate equal to around 2,800 people.

5.4 Government is aware of the deficiencies in the 2014 base figures, which are not confined to North Norfolk, but nevertheless, requires their use in all but exceptional (and evidenced) circumstances.

5.5 The Authority has successfully argued at Public Inquiry (the Sculthorpe appeal) that the 2014-based figures are an unreliable starting point for determining likely future growth levels in the District and that the starting population should be reduced to correct the error, before applying the other elements of the standard methodology. This same argument was presented at the recent Gladman appeal at Holt where the Authority presented the case that the 2016-based projections represented a more accurate starting point. At the time of writing, a decision is awaited.

5.6 If the Authority decides that the 2014 based projections are not a robust starting point a decision needs to be made in relation to what alternative should be used. In this regard, it is essential that the Authority does not simply pick an alternative starting number because it is lower - any alternative approach must be based on the evidence. A number of options could be considered:

- Continue to use the 2014 base projections but with an adjustment (reduction) to remove the errors they contain.
- Use the 2016 based projections which largely remove the previous errors in the 2014 figures and are more up to date.
- Use the 2018 projections which remove earlier errors and are the most up to date available.

5.7 Taken at face value the best approach would be to use the 2018 based figures as these are the most up to date. However, whilst these are the most current and do not contain the errors of the 2014 figures, they are derived using a different model which uses rates of migration over a preceding two year period to project forward from. Previous models had used a ten-year migration trend as this smooths out untypical annual totals and is more representative of longer term trends. In North Norfolk, the two year trend would 'bake in' untypically high rates of migration driven growth. If a ten-year migration trend is applied to the 2018 projection it produces a result much closer to the 2016 based figure, and the 2014 figure once the over-estimate of previous migration is corrected. For these reasons, **it is recommended** that the Authority uses the 2016 based Household Projections as the first input into the standard housing needs methodology. Using the 2016 based projection would also have the added virtue of being aligned with the start date of the Local Plan period which runs from 2016.

5.8 Applying the required standardised methodology to the 2016 Projections produces a future annual requirement of **456** dwellings (9,120 over the 20 year period).

## **6. Converting the Housing *Requirement* into a Local Plan *Target*.**

6.1 The housing 'requirement' and the Plan housing 'target' are different things. Once a *requirement* has been arrived at, either by applying the standard methodology, or



by making the case for an alternative requirement, it is necessary to consider a number of other factors before setting the final housing *target* in the Plan:

1. *Does the Authority wish to pursue a more ambitious growth strategy and aim to deliver more homes than the projections indicate will be required?*

The standard methodology result is described in national guidance as the minimum to be provided. It is open to each authority to make the case for higher numbers if local circumstances justify this. Examples might include opportunities for significant regeneration, a need to grow the local work force above those reflected in recent trends, or a need to provide more affordable homes.

2. *Is it necessary to adjust the trend based figures further to take account of any local factors not included in the projections?*

The household projections are regarded by government as the best available evidence on the need for new homes taking account of future changes in population and housing needs. The standard methodology is intended to be a universal approach which reduces the need for further localised modifications. Nevertheless, the approach does not remove the need to sense check the results of the methodology to consider localised factors which may impact on the need for accommodation. For example, the standardised approach would not take account of high levels of second and holiday home use which clearly reduces the number of dwellings available for permanent occupancy.

3. *What would be the consequences of delivering the required growth in terms of the sustainability of the District and should a case be made for a lower figure on sustainability grounds?*

There is no requirement in national guidance to deliver the housing requirement irrespective of impacts. Local authorities must be satisfied that the necessary growth can be delivered in a sustainable way and if not they should reach agreements with neighbouring authorities to address any shortfalls.

## **7. Appraisal and Conclusions**

7.1 It is essential to set the Local Plan housing target at a figure which will address all future needs over the period covered by the Plan as determined by the evidence. Failure to do so will result in an unsound Plan. The evidence indicates that a minimum of 456 (rounded up to 460) dwellings per year will be required to address needs arising from predicted population changes and household sizes (using the 2016 based Population and Household Projections). This figure includes a significant affordability uplift of 38% required by national guidance so would provide more homes than the population evidence alone would require. Due to the size of this uplift Officers do not consider that there is any evidence which would necessitate or justify any further upward adjustment.

Setting the minimum target at this level would require the delivery of at least 9,200 new homes over the plan period.

7.2 This figure of 460 dwellings per year is substantially below the 575 per year included in the consultation draft of the Plan. It is **not** however recommended that the Plan's delivery expectations should be reduced to the lower number. It is recommended that the Plan should demonstrate how it *could* deliver more than the minimum requirement and up to 550 dwellings per year. Hence, two separate recommendations are made:

1. That the Plan includes a minimum target of 460 dwellings per year.
2. That the Plan includes policies and proposals which provide for around 550 dwellings per year ie the Plan aims to deliver more than the minimum.

7.3 Such an approach would provide for a significant delivery buffer over and above the minimum requirement and would be consistent with the overall thrust of national guidance to prepare a positive Plan which delivers more homes. It would also mean that if the examining Inspector were not to be convinced about the target being set at 460 dwellings per year there would be sufficient headroom in expected delivery rates for the minimum target to be increased without the need to identify further development opportunities and produce a modified Plan.

7.4 Preparation of the draft Plan and its supporting evidence is a process which is designed to assess the sustainability of the Plans policies and proposals. The process has demonstrated that suitable development sites are available and subject to improvements in supporting infrastructure and the mitigations identified in the Plans policies that the proposed scale of growth can be delivered in a sustainable way. Officers therefore consider that there are no substantive grounds for considering reducing the housing target to a figure below the minimum requirement. Such an approach would fail to address identified needs, including for affordable homes and would be unlikely to be found sound at examination.

## **8. Recommendations**

- A. That the Authority uses the 2016 based National Household Projections as the starting point for deriving a Local Plan Housing Target.**
- B. That the Plan includes a target to deliver a minimum of 460 dwellings on average in each year of the Plan period.**
- C. That the Plan includes policies and proposals which will ensure that more than the minimum target, and up to 550 new dwellings per year, could be delivered.**
- D. That Working Party recommends revised Policy HOU1 to Cabinet.**

## **9. Legal Implications and Risks**

- 9.1 The Council must produce a Local Plan which complies with various regulatory and legal requirements and in determining its policy approaches must be justified and underpinned by up to date and proportionate evidence, the application of a consistent methodology and take account of public feedback and national policy and guidance.
- 9.2 The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making with further commentary

demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

**10. Financial Implications and Risks**

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

**Appendices**

Appendix 1 – Revised Policy HOU1

Appendix 2 – Schedule of representations

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## Policy HOU 1

### Housing Targets for Market & Affordable Homes

The Council will aim to deliver ~~between 10,500 and 11,000~~ a minimum of 9,200 new homes over the Plan period 2016-2036. A minimum of 2,000 of these will be provided as affordable dwellings will be provided. To achieve this specific development sites suitable for not less than 4,500 new dwellings will be identified are allocated. Development will be permitted in accordance with the adopted settlement hierarchy and the table below  
Note This table has been updated to reflect the latest available data on planning permissions and dwelling completions and will be kept up to date as Plan preparation progresses.

#### HOU1 - Reg 19

#### New Dwellings

th 2016 – 2036

1. Inclusive of approx 500 dwellings on the Trinity College site at Fakenham (decision on planning application pending).  
 2. Suitable sites to be identified in a Part 2 Plan

	<u>Column</u>	<u>A</u>	<u>B</u>	<u>C</u>	<u>D</u>
	<u>Settlement</u>	<u>Dwellings With Planning Permission at 20/01/2021</u>	<u>Dwelling Completions - All (01/04/16 to 31/03/20)</u>	<u>Proposed New Allocations</u>	<u>Total Growth (2016 to 2036)</u>
<u>Large Growth Towns</u>	<u>North Walsham</u>	<u>90</u>	<u>374</u>	<u>2,150</u>	<u>2633</u>
	<u>Fakenham</u>	<u>1136</u>	<u>194</u>	<u>688</u>	<u>2034</u>
<u>Small Growth Towns</u>	<u>Cromer</u>	<u>195</u>	<u>137</u>	<u>557</u>	<u>896</u>
	<u>Holt</u>	<u>260</u>	<u>252</u>	<u>227</u>	<u>747</u>
	<u>Sheringham</u>	<u>192</u>	<u>123</u>	<u>135</u>	<u>459</u>
	<u>Stalham</u>	<u>66</u>	<u>88</u>	<u>150</u>	<u>304</u>
	<u>Wells-next-the-Sea</u>	<u>35</u>	<u>79</u>	<u>80</u>	<u>202</u>
	<u>Hoveton</u>	<u>28</u>	<u>4</u>	<u>150</u>	<u>183</u>
	<u>Large Growth Villages</u>	<u>Briston &amp; Melton</u>	<u>91</u>	<u>33</u>	<u>80</u>
<u>Constable Mundesley</u>		<u>12</u>	<u>59</u>	<u>30</u>	<u>101</u>
<u>Blakeney</u>		<u>15</u>	<u>19</u>	<u>30</u>	<u>64</u>
<u>Ludham</u>		<u>11</u>	<u>2</u>	<u>40</u>	<u>53</u>
<u>Villages named in Policy SD3</u>		<u>187</u>	<u>261</u>	<u>400</u>	<u>859</u>
<u>Remainder of District</u>	<u>253</u>	<u>316</u>	<u>0</u>	<u>629</u>	
<u>Windfall Development 2016-2036 Across</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>2025</u>	

**Supporting Text:****Housing Target**

**The purpose of policy HOU1** is to set a housing target for the District in accordance with a distribution of development that complies with the proposed Settlement Hierarchy in **Policy SD3**.

~~The way in which the need for new dwellings is established has changed during the period that this Plan has been in preparation and may change further before the Plan is adopted. Government requires the use of a standard national methodology which is currently based on population and household growth projections for the period 2014 onwards. Later 2016-based forecasts have been published which suggest a significant slowing in the rate of both population and household growth. Government does not regard these 2016-based projections as a sound basis for deriving a housing target as they may not adequately address~~

**The Council will continue to review the housing target to ensure that it has taken account of the most up-to-date evidence when the Plan is submitted for independent examination.**

Over the period 2016 to 2036 the population of North Norfolk is projected to grow by around ~~41,5427,781~~ (2016 National Projections) so that by the end of the Plan period ~~414,810~~ 108,693 people will live here. Much of this increase results from net inward migration mainly from elsewhere in the south east by those retiring to the area. It is also predicted that people will live longer, average household sizes will remain low and that around 8-10% of all dwellings in the District will be used as second homes. These factors will contribute towards significant housing pressures in the District over the Plan period.

The NPPF aims to boost significantly the supply of homes. To deliver this increase in supply it requires that Plans should ensure that all of the likely future need for homes is planned for. This means taking full account of a wide range of factors including the changing accommodation needs of the existing population, predicted population growth, migration trends, ~~addressing previous shortfalls~~, vacant and second home rates, and considering how needs are being addressed by adjacent Authorities.

~~Plans must include a target for the number of homes planned and clearly explain how the Plan will deliver at least this amount.~~ The first stage of setting a housing target for the Plan is to establish how many new homes are likely to be required. National planning policy refers to this as establishing Objectively Assessed Needs (OAN) and includes a standard national methodology for arriving at this figure. The starting point is nationally produced household projections which are published every two years by the Office for National Statistics (ONS) and provide a trend-based projection of new homes required for each District over the next 30 years or so to address projected demographic growth. This demographic growth trend is then subject to a standard adjustment (uplift) with the size of the adjustment determined by the local ratio between incomes and house prices, with required uplifts being greatest in those areas where housing is the least affordable. This uplift in North Norfolk is substantial and results in around a ~~385~~ % increase in the housing requirement.

The current standard national methodology is based on ONS projections from 2014. ~~The Authority does not consider that these 2014 based projections accurately reflect historical growth rates in the District and show that growth in the years before 2014 was substantially higher than was actually the case. ONS has published revised projections with a base date~~

~~of 2016 which do not include the same over estimate and the Council considers these to be a more robust basis for establishing the future requirement for homes in the District. Based on the 2016 national projections the standard methodology produces a requirement for 9,200 new homes in the twenty years covered by the Plan. The Council has set this as the minimum number of dwellings to be delivered Using these for calculating housing need, the result for North Norfolk is 10,860 dwellings over the 20-year period between 2016 and 2036. This equates to an annual average requirement of 543,460 net new dwellings.~~

The Council has considered if it is necessary or desirable to depart from the standard national methodology. There might, for example, be local reasons why the trend-based projections published by ONS require some adjustment to take account of specific local factors. For example, whilst future birth, death and longevity rates are highly predictable, the rate of inward migration, which is the main determinant of population growth in the District, can be subject to change. It is also important to consider employment growth projections to ensure that sufficient homes will be built to accommodate the future workforce and to ensure that the total number of homes built will also deliver sufficient affordable homes.

~~Once it has been established the figure for the District may not equate to the Plan housing target. It is necessary to consider how housing needs are being addressed in a wider Housing Market Area (HMA) and establish if any shortfalls elsewhere should be addressed in the North Norfolk Plan. As part of the Duty to Co-operate the Council has considered the housing needs arising in all of the Norfolk Authorities and it has been agreed that North Norfolk need not make any allowance for needs which arise elsewhere in the County as these will be addressed by the Local Plans of the neighbouring Planning Authorities. This is explained in more detail in the Norfolk Strategic Planning Framework and Statement of Common Ground. It might also be appropriate to set a lower housing target if the evidence suggests that delivering what is needed would result in unsustainable or harmful development, and in such circumstances we would then need to seek agreement with adjacent areas to accommodate any shortfall.~~

~~Having carefully considered these factors, and because applying the standard housing needs methodology to North Norfolk results in a very significant uplift in housing requirements which is well above demographic growth projections, the Council considers that no further uplift is required, or justified. Pending the results of an on-going review of the national standard methodology, we intend to provide for between 10,500 and 11,000 dwellings in this Draft Plan, but will keep this under review. Delivering a target of 550 dwellings per year is around 30% more than is being delivered by our current adopted Plan and this number has rarely been delivered previously in the District, including at times when substantial amounts of development land has been available and market conditions have been favourable. The Council will wish to carefully consider the deliverability of the final housing target before submitting the Plan for examination.~~

On the date that the Plan is likely to be adopted, part of the required housing target over the Plan period 2016-2036 will already have been built. A further quantity will have planning permission but will not have been built, and over the remainder of the plan period the Council would also expect a proportion of the required growth to be delivered via windfall developments. These windfall developments comprise small scale infills, redevelopments, re-use of existing buildings and affordable dwellings in the designated Countryside Policy Area. They have delivered a significant proportion of the total homes in the District for many years. There is no evidence to suggest that this source of new homes will significantly diminish in the future. Even so, the Council has reduced its expectations in relation to future windfall housing to a figure which equates to around 50% of the historic rate. The remainder of the Plan housing target will be provided for through the suggested site allocations in this Plan which will deliver an addition 4,700 homes. ~~How the Plan proposes to distribute development is explained in 'Settlement Hierarchy'.~~

We have explained more about the process of setting a draft housing target in **Background Paper 1 – Setting the Housing Target.**



## Appendix 2 – Schedule of representations and responses

### Housing Policies

#### Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Amey, Peter (1209779)	LP011	General Comments	Before permitting further development in and around the Hoveton area consideration must be given to the ever increasing traffic flows through the village. This is a tourist area and the main A1121 is one of the worst areas of pollution in the county caused by the slow moving and often stationary traffic belching out fumes for the tourists to inhale whilst they walk around the shops, cafes and other amenities. More houses means more people and thereby more cars resulting in more noxious gases. It is not just the building development in Hoveton that is the problem but any development north of Hoveton that wishes to travel to Norwich or connect with the NDR. To keep poisoning residents and tourists alike is unacceptable and the problem needs to be addressed before any further development takes place
HOU1	Alexander Mr & Mrs (12118472)	LP782	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> My husband and I believe this development of 2000 houses on Farm land is a big mistake. Firstly in North Walsham we have not got the infrastructure at the moment to deal with the amount of people who are here now examples; doctors, dentists, home care, schools, hospitals, road structure, drainage and electric supply. Secondly we should build council homes for the waiting list of people in the area. They should be built on brown sites and owned by the council so they are affordable. We need the farm land to produce food for the country, why put profit for the few over the wellbeing of the community. - Most of the houses being built will be for outsiders coming into the area, not for the youngsters who live here and want to have a decent home with reasonable rent or houses to buy which they can afford. Also for the elderly downsizing homes that would improve their life. Also where are the jobs for the influx of people coming into the area?
HOU1	Cheeseman, Mr Alan (1218485)	LP677	Object	The proposed plan to build over 2000 new houses in the area is a serious misjudgement. To add an extra 2000 + households to the area would increase the population by almost 50%! The current infrastructure of the town will not be able to support this number of people. An influx of a great many more residents would mean increased traffic and movement of people in an area that already has a 'poor' system of roads. environments and habitats for our flora and fauna changed and lost forever. The area would benefit the community if it was used for sustainable agricultural food production, employing local people to manage it. There appears to be no apparent attempt to address the ever- present threat of climate change.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Carr, Mrs Elizabeth (1216730)	LP438	General Comments	<ul style="list-style-type: none"> <li>• Whilst second homes/holiday homes may stand empty for some of the time and may not contribute to the local economy they do ease the strain on the local NHS and traffic on local roads...insisting on full time occupancy for new build homes would help ease the 'community' situation but increase problems with lack of provision of infrastructure.</li> <li>• With larger new build executive 'second' homes, a way of deflecting ownership away from absent owners towards full time occupancy would be to increase the size of the garden. Make affordable homes more affordable. Restrict some new housing developments to full time occupancy.</li> </ul>
HOU1	Cole, Mrs Teresa (1209821)	LP029	Object	I note in your Planning Minutes of October 2018 that the " latest household projection figures published in September had indicated a dramatic fall in population and household formation which suggested that lower housing targets in the Local Plan would be defensible The Government was revising its methodology as the projections suggested that the required number of dwellings would be less than the Government's policy position. Based on the figures, the Council's target had fallen from 520 dwellings per year to 438 per year, which would result in 8,700-8,800 new dwellings in the Plan period instead of up to 11,000 which had been agreed at the last meeting. " remove the allocation for development of the land at Runton Road/Clifton Park from the proposed draft plan
HOU1	Cook, Mr Geoff (1216625)	LP209	Object	Sustainable Development I would question the need to provide up to 11000 more homes in North Norfolk with a projected increase in population of 10000 people, especially when more people are dying than are being born in the district. If the average number of people per house is 2 only 5500 houses would be needed and new developments and planned developments should reduce the number even further. It is unclear whether the proposed number of houses could even be built – "Council needs to consider deliverability of 30% more houses per year than currently" The plan needs to be consistent with the percentage of the older population (in 2011, 58% of the population was over 45 but in 2036 40% will be over 65) as this will clearly affect the planning assumption that the older population will increase and what housing is required.
HOU1	Witham, Mr I M (1216498)	LP348	Object	The housing target is excessive, with too great an emphasis being placed upon projected figures for migration into the area from elsewhere in the country. I advocate a complete re-think, on the part of both the district council and Central Government, on the principle of working-in such a high projected figure of in-migration into Norfolk and this district, from other parts of the country, in the housing allocations.
HOU1	Young, Mr David (1210531)	LP051	General Comments	<p>~Concerns regarding the impact of second and holiday homes on the housing supply and market.</p> <p>~the occupants are not in situ for long enough to make any meaningful contribution to the life of the local area</p> <p>~prices have escalated to a level far beyond the dreams of most local young families or individuals</p> <p>~villages are in danger of atrophying to the extent of becoming "ghost towns" in the off season and their long-term viability being precarious.</p> <p>~it is tempting to suggest the St. Ives option, under which all new-builds are for permanent residence only. In the context of North Norfolk, one could go further and require such permanent residents to have a "local</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				connection" as per the Local Lettings Agreement, or at least such a connection to North Norfolk as a whole. Such a restriction would not need to apply to the whole of North Norfolk: perhaps only the coastal strip between Wells and Weybourne, or to the coastal AONB.
HOU1	Symonds, Ms Ann (1209801)	LP208	General Comments	Since Beeston Regis is in close proximity to Sheringham and services and amenities are shared Beeston Regis could be considered for overflow if Sheringham or Cromer become over burdened, or at least provide a more 'rural' form of residential development for those not wanting to be located in a town setting. Land in Beeston Regis considered as countryside should be considered for eco developments and green living options. The environment and landscape could dictate what type of sensitive development or other use takes place. By decentralising development it would relieve transport congestion and other issues faced by a growing population in the coastal areas.
HOU1	Swift, Mrs Julie (1216911)	LP249	Object	I believe that we are overdeveloping North Norfolk and I believe that could detrimentally impact our tourism, which is a large part of our economy. Towns like Holt and Cromer are thriving tourist towns. However, the majority of tourists come here to see the lovely market towns and villages with their brick and flint properties. They do not come to see sprawling housing estates that look exactly like the ones around London or in the Midlands. Mass produced designs that do not reflect the character of the area. Also the number of estates being built is already affecting the road network. Towns like Cromer are grid locked outside of the tourist season these days. People could stop coming the area due to the overdevelopment and poor designs of development and the Highways problems caused by all this development (no one wants to spend half of their holiday sat in a traffic jam through Cromer). What happens to the local economy if tourism decreases? The holiday homes will be sold flooding the market. We could end up in a depressed area with a mass of empty decaying old and new properties alike. I do not know where all these extra people are coming from to fill these thousands of new properties. Are they moving from old traditional properties? If so will they become holiday homes or even worse empty shells? I feel that NNDC are failing in their duty to protect the character of this lovely area in which we live and they are failing to consider Highway safety in the area as we do now have the road network to support this constant development proposed. Seeking a more sensitive approach to development in North Norfolk, with thought given to design and to the road networks in the area.
HOU1	Swift, Mrs Julie (1216911)	LP248	Object	Southrepps is a 'rural' village with working farms, both arable and livestock. Its road network comprises of mainly single-track rural lanes. The main road through the village is regularly used as a cut-through to the A149 and A140 from Mundesley. The 'main' road through the centre of Southrepps is not capable of carrying two medium/large vans side by side. The figures on the Parish Councils website from the new SAM2 unit already record over 60,000 vehicles a month passing through the village (30,000 in each direction). The SAM2 unit also records a high percentage of these vehicles travelling at speeds in excess of the 30mph speed limit. Further development in Mundesley will increase these traffic numbers further and will put an intolerable strain on the road network through Southrepps and will endanger vehicular and pedestrian users of these roads. I am

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				seeking a more sensitive approach to development in North Norfolk, with thought given to design and to the road networks in the area.
HOU1	Swift, Mrs Julie (1216911)	LP247	Object	I am seeking a reduction in the number of new houses planned for Mundesley due to the impact it will have on the local area roads. As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). At an absolute bare minimum 2500 houses will generate a minimum of 17,500 car movements per day. The one way system through North Walsham is not designed to handle these volumes of traffic. It isn't just the cars - its the associated delivery vans etc. that will be visiting the properties as well. North Norfolk does not have the infrastructure to take this level of development. Also where will the occupants of these 2500 houses work? There is not enough employment in the area to sustain this level of increase. Creating employment areas is not enough - the brownfield site by Waitrose has been an eyesore for 20 years or more s no big companies want to be based here. Are we now going to be a housing area for London commuters? People who will not support the local area? Where are all the occupants for these houses coming from?
HOU1	Swift, Mrs Julie (1216911)	LP246	Object	I am seeking radical changes to bypass Cromer Town Centre for vehicles and a drastic reduction in the number of houses proposed. The roads cannot cope. A bypass however, will not help the lack of doctors available. For this I seek a reduction in the houses proposed. I work on the main road through Cromer and have done for 16 years. In the past during the "peak tourist" times like Easter and the Summer School Holidays the main road outside my office regularly ground to a halt due to the volume of traffic and getting into and out of work was difficult. However, outside of these peak times traffic flowed reasonably well. However, now the traffic is continually crawling through Cromer all the time. There are regularly queues to get through the town...and this is before the peak tourism traffic hits. The development up the Roughton Road has definitely had a noticeable impact already. As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). The Local Plan wants to add almost 600 extra houses - even at its bare minimum this would generate over 4,000 extra car movements per day through Cromer. In reality it would probably be nearer to 5,000+. The roads will be permanently grid-locked and in peak tourist season no one will be able to get into or out of the town. People who work or live in Cromer simply will not be able to get into or out of work/home. It isn't just the roads. The Doctors surgeries in the area cannot cope with more people. My husband has a heart problem and had to wait two weeks to see his doctor to discuss concerns he had with his health. This will only get worse with 600 new properties...adding thousands more people to the Doctors patient lists. It is no use building more surgeries if there are not the Doctors to fill them. Cromer surgery has lots of empty consulting rooms but cannot get the Doctors to work in them. Cromer does not have the infrastructure to deal with the planned increases in housing.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Faulkner, Mr Anthony (1216674)	LP532	Object	Provision for new housing in the coastal parishes such as Blakeney should not include market housing but should be limited to affordable housing only, for which there is a great demand, due to the low level of pay in these areas compared with the high cost of property. Market housing is likely to largely, or entirely, be used as holiday homes and will not therefore contribute to the national need for permanent housing. Development in these parishes should be for affordable housing on exception policy land where the future use as affordable is guaranteed. This would keep down the cost of the land allowing housing associations to be able to fund the cost of building without the need for subsidy from market housing. Market housing should be allocated to towns where there is opportunity for work, or inland villages on, or near, public transport routes to employment centres. These villages will benefit from some development, helping to retain shops, surgeries and other amenities and the houses are likely to become permanent residences, unlike those in the coastal parishes. Remove the allocation of market housing from the coastal parishes such as Blakeney. Select smaller sites for affordable housing on exception policy land, perhaps for groups of six to ten houses. Possible sites would be on part of BLA01 as an extension of Oddfellows, or on BLA05 because of its proximity to the primary school.
HOU1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP266	Object	The Policy should be more flexible, so that more homes can be delivered in Small Growth Villages if sustainable sites are available. The policy should be amended to make it clear that the figures in Policy HOU 1 are not maxima, but minima. Policy HOU 1 makes provision for the delivery of 400 new homes in the Small Growth Villages; these will be allocated in the Local Plan Part 2. However, this figure should not be taken as a maximum. The NPPF aims to significantly boost the supply of housing. While the Plan seeks to make provision for the current housing requirement, this figure could increase, and the Plan should be sufficiently flexible to adapt to any increases in housing requirement in the near future. Paragraph 2.13 of the Background Paper 1 – Approach to Setting the Draft Housing Target – notes that ‘the housing target likely to be included in the final Local Plan might change’ and that before the Plan is due to be examined, the 2018 based ONS household projections will have been published, which could result in a change to the housing target in the Plan. As set out in paragraph 7.18 of Background Paper 2 (Distribution of Growth), Roughton has key services including a primary school and a GP surgery, a wide range of secondary services including Post Office, public house and meeting place, and a number of desirable services including a petrol filling station and a place of worship. Roughton also lies only 3.2 miles south of Roughton Road railway station, which provides train services to Norwich. Bus stops in Roughton on the A140 provide easy access by bus to Cromer, which is located 3.7 miles to the north. North Walsham is only 6.5 miles away, and Norwich 19.6 miles. The housing target for villages which offer shops and services to their own residents and to those in smaller villages in their catchment areas should not be restricted to a total of 400 units, if further units can provide sustainable development, and can contribute to the continued vitality and viability of those villages.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Taylor, Ms Siri (1216252)	LP188	Object	I question the need for the amount of housing proposed for Cromer, is this based on central government population growth projections? how does this tally with our actual local figures? Based on the overall number of houses proposed for the town (590 dwellings) how will Cromer's infrastructure cope with this huge increase in traffic and population. The doctors surgery is already under pressure, the roads cannot cope - especially during the summer gridlock. Cromer is the only large town development which has no bypass - nor, because of the geographical layout, is there any viable means of building one. What jobs can we offer these new residents? There are not enough affordable low cost or rental units in the proposed plans, I wonder whether the alternatives have been adequately investigated. Particularly the development of housing within existing structures e.g.: flats above town centre shops and in empty or redundant buildings, freeing up holiday homes by increasing their council taxes and developing more council controlled housing. As a town which relies heavily on tourism based on our landscape and coastal aspect - as well as our traditional, unhurried and uncrowded atmosphere, I suggest the plans should seriously take this into account. As a council which recognises the declared climate emergency this is the time for innovative thinking, surely it would be sensible to investigate alternative solutions to local housing needs.... or we seriously risk "killing the goose which lays the golden egg". Recalculate proposed number of houses. Investigate alternative housing in existing buildings - creative thinking! NNDC should strive to protect our tourism offer by limiting excessive new development, and aim to support the recognised Climate Change Emergency by protecting our important existing green amenity spaces.
HOU1	Mr Daniels (1217050)	LP257	Object	The plan needs to fully assess address the pressures arising from Norwich on the North Norfolk District housing market and seek to address this. The plan is too focused on North Norfolk District and does not fully consider external influences
HOU1	Johnson, Mr & Mrs (1215700)	LP142	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Evidence of how the original figure of 8000 new homes was arrived at should be included. In the interests of transparency the strategic housing market assessment should be appended to show how the council has arrived at this figure. Should the uptake of sites not be fully realised but at least 8000 (your figure) be built thereby meeting the Government's target would the council review the target and determine at that time whether it is appropriate to continue to the figure of 11000, whether the uplift is still appropriate or needed, or re assess the figure and lower it in order to avoid over development? Is there provision in the plan / policy to do so or is the county locked into building 11000 houses regardless of changes in demographic or demand? HOU1a and HOU1b are definitely inappropriate. Any policy should be capable of review during its life and not have a target simply set for 20 years
HOU1	Johnson, Mr Jamie (1216384)	LP345	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is commendable that the local plan is considering in paragraph 9.7 small developments of 2 to 3 dwellings on greenfield sites to address

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				the need for growth, future viability and vitality of rural communities where conditions for permanent residence restrictions would be applied.
HOU1	Stubbs, Mr Nick (1217346)	LP335	Object	We already have a high proportion of holiday homes, indeed one of the few areas for development (The Parishes) has recently been completed, with every property sitting empty for much of the time - I understand they are all second homes. There is even a house in Beck Close which has been left boarded up which surely could be utilised. Location specific evidence needs to be gathered to confirm what are the actual needs of any town/village in the region, rather than a top-down diktat to build, simply providing profits for developers
HOU1	Johnson, Mr Jamie (1216384)	LP347	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Paragraph 9.8 I would imagine it would be prohibitively difficult to police a second homes occupancy restriction and I would therefore instead be in favour of the approach described in 9.7 where greenfield infill sites within existing settlements or predominantly built up areas of designated countryside are permitted for 2 to 3 dwellings development subject to a permanent residence restriction and respect and cohesion with the prevailing local character. . This would be in line with NPPF paragraph 78: 'planning policies should identify opportunities for villages to grow and thrive'. NPPF paragraph 68. 'to promote a good mix of sites, LPA's should support development of windfall sites through policy and decisions giving great weight to the benefits of using sustainable sites within existing settlements'. NPPF paragraph NPPF paragraph 118 on 'Making effective use of land' paragraph which state that planning policies and decisions should "promote and support the development of under-utilised land" and "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" .
HOU1	Kelly, Mr Sean (1216516)	LP198	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> What evidence do you have of any "identified" need for this scale of development in Mundesley? You have arbitrarily allocated this number to Mundesley in order to meet the government target for the number of houses to be built in North Norfolk. You have then, simply to reduce the work load arising from the development of a new Local Plan identified an area of land of sufficient size to deliver the allocation in a single parcel. There is a ready supply of properties of all types for sale in Mundesley particularly at the starter home end of the market which would be attractive to local residents. There is no requirement for anywhere near this number of additional homes in Mundesley and, as evidenced by the recent development on the north side of this site it is highly likely that proposals will be to build as many expensive high end homes as possible. The scale of the development is not appropriate for the site as because of the topography of the and it will completely dominate the surrounding area. Any development of the southern area of plot 1 in particular will be several feet above the level of surrounding properties in Church Road, Church Lane and the north end of Manor Road. Any development in this area will completely obscure the horizon for all properties in that area. Because of the elevated position of the site any large scale development will be visible for miles around. The site is surrounded on three sides by the conservation areas of Mundesley a development on this scale, especially at the southern end of the plot will

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				impact negatively on those conservation areas by completely altering the character of the immediate surrounding area from open farmland to dense urban development. There will be no point in having a conservation area. There are no employment sites nearby so a development on this scale will result in a significant increase in commuter traffic as. This is also true for travel to secondary and tertiary education as well as healthcare facilities and all retail activity except for immediate local store type shopping. Replace the large scale development in the proposed plan with a significantly smaller development on this site and identify other smaller scale sites in the surrounding area. Restrict development on this site to the north west of the site so it will not dominate the existing homes that surround the current proposal and will be less prominent in the landscape. Any public open space should be formed in the area adjacent to Church Road and Lane to reduce the overbearing nature of the current proposal on the surrounding properties.
HOU1	Needham, Mr Colin (1216785)	LP269	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> I found the consultation documentation wordy, fragmented and hard to read so I may not have fully understood the basis for the calculations. My understanding is that there is a genuine social need for housing for residents to live in. I do not believe there is a social or economic need for allocated land for partially occupied second homes or homes to let for holidays. A community thrives when there are sufficient full time residents of all ages and aptitudes to make it work. Kids for schools, passengers for the buses, businesses for employment, support for neighbours, volunteers for community groups and indeed, congregations for churches and chapels. Allocating land in rural villages for developments suitable for sale for second homes and holiday letting will inevitably have an adverse effect on rural communities. The consultation document does not highlight or consider in detail this this adverse impact or offer remedies. The housing allocation should be calculated on the basis of need for those who wish to live (as full time residents) in the communities designated for growth. The construction of new houses on allocated sites and the conversion of existing houses for second homes should be positively discouraged. Within the limitations of planning policy this could be achieved by prescribing certain house types ,controlling housing density and the proportion of affordable and social housing in new developments.
HOU1	Noble, Dr Michael (1210275)	LP123	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> In Stalham a total of 150 new dwellings are planned. The Health Authority's view that that this will not impact on local medical services is over-optimistic. All GP services are under increasing pressure even without increasing the local population. This will also be true for local schools. The current proposals will therefore diminish services for existing residents and not provide the promised local employment opportunities. The use of greenfield sites is contrary to the historical aims of planning policy in this country and just adds to the environmental disaster we are leaving to the next generation. Surely a better use for these plots would be to provide green spaces such as parks with wooded areas for local families to enjoy. There are many good examples around the country which add quality to the health and wellbeing of the community and which would add to our environmental credentials by locking-up carbon rather than releasing more into the atmosphere. Please consult with local service providers



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				such as surgeries and schools to gain a realistic view of the impact of further increasing the local population. Please consider how this land can be better utilised to add to services for existing residents, such as local employment opportunities and green spaces for the benefit of the whole community.
HOU1	pettit, miss claire (1215847)	LP333	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> In 12/1 where it puts that Cromer has been chosen for large growth, and the 600 extra homes, 12/2 it contradicts this fact by mentioning the significant landscape constraints which limit the potential for growth. The extra pressure that this development would cause on the special character of Cromer re traffic in our already snarled up central one way system, parking, health services , etc., would be detrimental to locals and holidaymakers alike. To lessen the scale and number of proposed houses required ,thus removing the need for an extra school.
HOU1	Price, Ms Amanda (1210607)	LP070	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> more restriction on second home and part time occupancy - it is unwise not to restrict some portion of the new housing to full time occupancy, and to owner occupation. In Wells local people are saying that even a 28% allocation at a 20% reduction in costs ( I am sure new home builds will want to sell for as high as they can as many houses as possible) will still price local people out of the market, AND lead to even more houses standing empty for most of the year with only occasional lets. This is counterproductive for the local economy, So I would like NNDC t reconsider this policy. And also for those houses which are sold without such a restriction, there should be a higher Council tax and some tracking / monitoring of occupancy.
HOU1	Rayner, Mr Andrew (1217466)	LP635	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Type of development:- who is the housing aimed at? I fully understand the need for social housing and affordable (the definition of which means it is still usually expensive.). if its for second homes etc. then it is not acceptable.
HOU1	Rose, Mr Alan (1217227)	LP577 LP821	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Support house building - we all need somewhere to live. But what is planned is like adding a whole new town that's bigger than Stalham to North Walsham and I am worried that it is going to be done with hardly anyone having their say. When I attended a recent meeting in North Walsham to discuss the new Local Plan - there was just 32 people there. I spoke to a number of prominent businesses around the town and none of them were even aware that the Plan is being drawn up. Where were the voices of young people from the schools and the college who will inherit this town and have to live with the decisions being made that they have had no idea of or say in? The Town and District Councils should be engaging with these young people through the schools and college if this is to be an inclusive plan.
HOU1	Wells, MS Judith (1217777)	LP665	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is necessary to create additional housing in Wells next the Sea. The lack of affordable accommodation for the native community is already well-attested. My concern is that enforceable measures be taken to ensure that these proposed new properties do not become additional second/holiday homes, reducing the potential housing stock for local people. What will be done to ensure this?

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HOU1	Mr Phillip Duncan (1217309)	LP413	Object	Housing - Second home Ownership The Council confirms in para. 9.4 that new dwellings could be legally conditioned to ensure they could only be used as main residences, but that (in para 9.8) it is currently not minded to and will reconsider this following consultation. There is much written about the need for affordable homes and the pressure which second home ownership is causing on the potential to house local people. It is recognised in the Draft LP (e.g. para 9.25) that the District has a “low wage economy and in much of the area house prices are high”. The Draft LP recognises (para 9.27) the high level of need for affordable housing. If a high percentage of the homes which are planned for are taken up by second home owners, this adds further to the housing need and therefore risks inaccuracies and underestimation in the overall assessment of need. This would therefore support the use of legal conditions to limit second home ownership.
HOU1	Mr Phillip Duncan (1217309)	LP415	Object	Housing – Policy HOU1 The total growth proposed in Policy HOU1 for Cromer is very small in comparison to that proposed for the other Large Growth Towns. It is so low that it is more like the growth level proposed for Holt, a Small Growth Town. However, Cromer is (as noted in paragraph 12.1), the District’s main administrative centre; a popular tourist destination; centrally located in the District on the principal road network and railway line to Norwich; and hosts the District hospital. As such, the town should have a greater allocation of housing than is proposed in order to ensure its vitality. Furthermore, Cromer has the second largest retail provision in the District (para. 12.5) and is a “net importer of employees” (para 12.4). There is therefore, a clear need for greater housing in the town in order to reduce commuting. The town road network is widely accepted as suffering from bottlenecks and consequent rat-running. Norfolk County Council as Highway Authority has confirmed to us that there would be significant benefit in a new link road to the south of the town, between Norwich Road and Felbrigg Road, with a first phase joining the A140 Norwich Road with Roughton Road. The NCC Officer responsible for infrastructure has confirmed that the Authority is supportive of South Cromer development which would deliver a developer funded link road and other essential infrastructure such as a school, in a co-ordinated and planned manner. We therefore consider that the proposed housing targets in HOU1 should be revised so that Cromer receives a higher level of growth which is appropriate to its functional importance and to deal with unresolved commuting, transportation and infrastructure issues. See attached Paper: why Cromer should have more development than is proposed
HOU1	Bluss, Mr Andrew (1210045)	LP027	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Concerns the countryside is under threat from development. Appreciate that councils/authorities have been set housing targets. My main concerns are:- 1) Who are they for 2) Where they are sited 3) What potential impact will it have. From what I know, it is proposed that upwards of 1500 homes are planned for the west of North Walsham. Recognised there is a national housing shortage but how will the building of these properties benefit the town? These homes are being planned for the expansion of the “silver haired” generation who will (According to NNDC) be migrating from outside the county over the next 17 years.

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				All NNDC seem to care about is the number of houses they are required to build with little or no consideration of the full impact! What will this new population want with the proposed single primary school?
HOU1	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP658	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Paragraph 77 of NPPF states: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.' Paragraph 78 of NPPF states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.' The Plan identifies Large Growth Villages as settlements which are local service centres, and which support rural sustainability. Blakeney is designated a Large Growth Village. However, the Plan only designates one site for development in Blakeney for 30 dwellings. This seems very limited in terms of allocating housing growth to Blakeney, in light of the Plan's recognition of the sustainability of the village. Blakeney have a range of shops and services and thriving community facilities, it has a primary school, and a regular bus service along the coast. The Plan should allocate more development in Blakeney, in recognition of its role as a Large Growth Village. The plan should allocate more development here, in recognition of its role as Large Growth Village.
HOU1	Brooks, Mr David (1217039)	LP253	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There is a very high percentage of second homes in Blakeney, Salthouse, Cley and Weybourne. Although this may be beneficial to property owners and for trade during holiday periods this can have the effect of destroying local neighbourhoods. Impact on affordability for younger people who want to start on the property ladder as a high number of new properties are priced and aimed at 'second home' owners. Other areas of the country such as St Ives and in Northumberland are taking action to restrict sales of properties to second home owners and details were provided to David Young and Sarah Butikofer in May 2015. Is the Local Plan considering this aspect?
HOU1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The 2018 Government Housing Delivery Test identified that North Norfolk have delivered 126% of homes required over the three-year period ending 2017-18 which is positive. Anticipated current Core Strategy target of 400 dpa will increase to 553 dpa. However, The housing requirement should be a minimum figure not a range limited to a maximum of 11,000 and arguably higher to provide the flexibility to deliver sufficient housing in accordance with recognised need throughout the plan period. Support the identification of 592 dwellings on sites in Cromer. However, to provide sufficient flexibility to deliver housing over the plan period – and for the avoidance of doubt, the wording should be amended to confirm that homes can come forward on allocated sites on the edge of the existing settlement boundaries of the Large Growth Town (within which Cromer falls) Releasing edge of settlement land for development in the instance Site C16 is both sound and justified, having

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				regard to national policy and the supporting evidence base. Nevertheless, it should be made clear that the 592 figure and 909 figure for the total growth (2016-2026) for Cromer is a minimum. Specifying a minimum requirement of 909 is a pragmatic and sound approach which will allow the plan to adapt to meet housing need over the plan period.
HOU1	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Building 11,000 houses, each with high carbon construction costs, and the associated infrastructure, will hugely increase carbon emissions. Dangerous policy, completely contradicting current knowledge, policies and priorities. New work and widespread consultation should be undertaken to produce a local plan fit for current circumstances.
HOU1	Ringer, Mr Callum (1218561)	LP772	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The council should priorities homes for local people, and make efforts to keep them affordable. Impose bans on second homes, as has happened in the south west. If possible, this should be included.
HOU1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The Plan is generally sound having regards to the tests set out in NPPF. Plan prepared positively, it sets out a mechanism to meet North Norfolk's OAN. Housing numbers as a minimum number to be delivered in the plan period is an appropriate method of boosting housing supply and delivery
HOU1	Buxton, Mr Andrew (1218433)	LP761	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> 1. Proposed 10,000 or so houses is far too wasteful of scarce land
HOU1	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> I know orders are coming from national government, but I'm concerned that the building of such a large number of new properties in a relatively small market town isn't sustainable in these times of climate change, real poverty, and environmental debilitation. The town doesn't have the infrastructure to support such a large development (e.g. doctors' surgeries and other medical/home care provision, are both already oversubscribed).
HOU1	Rayner, Mr Andrew (1217466)	LP635	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Increase in population: Such development will require new roads, access to the town centre and its shops. Existing Roads can just about cope, how will traffic be managed? 1800 homes equates to at least 1800 vehicles. Parking in town is already difficult and will the extra traffic will lead to pollution and congestion. as some of the site is to be earmarked for commercial use there will also be a likely increase in commercial/service vehicles as well.
HOU1	North Norfolk District Council Members for	LP802	General Comments	The level of development which is proposed for North Walsham would impose a considerable strain upon our town. We share the concerns of the Town Council that the scale of growth suggested for North Walsham is unprecedented. If such growth is to occur then we must have timely and appropriate investment in our

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	North Walsham Gay, Cllr Virginia (1218492)			infrastructure. The Western Extension Link road must join the North Walsham Industrial estate to the Norwich Road and that this road should be built before the construction of housing begins. Declared a climate emergency has significant implication for North Walsham as it is a growth town. We endorse North Walsham Town Council's requirement for a robust assessment of the threat which the proposed scale of growth would pose to medical provision within our town and we agree with them about the necessity for a new primary school accessible from a western extension link road running from the Norwich Road to the District Council's Industrial Estate.
HOU1	Willer, Mr Kevin (1210031)	LP022	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Opposing so many new dwellings in North Walsham, particularly on the western side of town. This kind of proposal is over development on a massive scale using many green belt areas. I understand the need for some housing but 2000 plus for North Walsham would be a disaster. The current infrastructure into and around the town is totally inadequate and busy at the best of times. Another 5000 people in the town meaning probably 2000 plus cars will cause chaos. In particular roads such as the Grammar school road and the old roads through town, which already suffer with heavy traffic, would not cope with more. The new link Road proposed may well stop some lorries coming into the town and allow people access to new estates but will go no way into solving the traffic problems around the rest of the town, more cars will only add to it. The effect on the environment also concerns me. Living on the Skeyton Road and enjoying views of the countryside we are privileged to see a whole manor of wildlife extending from our garden over to Weavers Way. We see deer, bats, hedgehogs, pheasants nesting, skylarks nesting in the field, owls plus many other species. Nobody ever seems to give a dam about the wildlife in a time when we really should be caring about them and our environment. More cars causing congestion means more pollution. Our children walking to and from school already suffer enough pollution. The council do not consider the lives of all those, like us, who are directly effected by the proposals. Having houses being built behind us and next to us will destroy our current lifestyle destroying views of outstanding beauty and destroying a peaceful life, which is why we moved to our house in the first place. Our properties will no doubt loose value, our ability to sell as of now is limited due to the uncertainty of what will be happening in the fields around us. Effectively our lives are on hold awaiting noise and disruption. Do we qualify for compensation? As it stands no doubt the landowners of the fields identified as new dwelling sites are set to become very rich whilst current residents suffer. People enjoy the peace of Weavers Way, effectively North Walsham's piece of peaceful countryside, but now this is to be ruined by being surrounded by houses and a road going right through it. The services in this town are already stretched to the maximum. There is a mention of a new primary school but what of the impact on the high school and college? The Doctors surgery is constantly busy, it takes weeks to get an appointment, having attended the drop in session at the community centre today I heard the planner say that's a problem for the NHS there should be more doctors at the surgery. Great attitude and a typical one that suggests the desperate need to adhere to pressure and get building. In my</p>

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				opinion if the government can't sort important problems such as health care to meet communities needs then they should not be forcing councils meet such high housing targets! The planner also mentioned that the highways agency have provided evidence that North Walsham does not suffer traffic issues. This I cannot believe as I have lived in the town and regularly get caught in traffic. Surely there is a point when a town can become too big for its own good? The only ones to benefit are the landowners, developers and council. Cannot see any benefits for current residents by over building like this. Object to preferred site in North Walsham.
HOU1	Willer, Mrs Jill (1210911)	LP099	Object	I have seen many changes and developments in and around the town. I truly believe that the town has almost reached its capacity and any new builds should be limited to brown field sites. The number of new builds suggested needs to be scaled down. 2000 plus is unrealistic. We have just had new house builds on the Norwich Road, putting an extra strain on our doctors surgeries, dentists, drainage, water supply and the national grid. How would they cope with the population of another 2000 dwellings? The NHS dentists in the town are no longer taking on new clients, we cannot obtain new doctors due to the work overload and stress of it all! A population increase means more cars commuting to schools. There is suggestion of a new primary school but what of the strain on the high school and college? The town network cannot cope with all the extra traffic. To suggest an increase to the industrial estate with extra units as a solution to the lack of jobs in the town is ridiculous. The days of high employment in the town are long gone with the major employers of the 1970's and 1980's. We will have more houses than ever but less jobs than past times. One of the reasons for Crane Fruehauf closure was because of the poor road network to North Walsham and this has not improved since the closure, 20 years ago. Why not build between Norwich City limits and the NDR first. People need work and the vast majority of jobs are in Norwich. People already commuting between North Walsham and Norwich do not have a good road network (B road). It is immensely busy. More cars would put a strain on this. What about the nature habitat. There are 17 species of bees regionally extinct, 25 types threatened and 31 conservation concern. We will not be able to survive in the future without them and nature. This proposal would see North Walsham expanding out of control over beautiful countryside. With the running out of oil for artificial fertilizers, our future generation will need the land to go back to organic growing in order to feed the population, instead of intense farming. They will need the green belt land that this proposed plan will take. Why should people who have already made their homes in North Walsham, especially on the west side, have to put up with all this disturbance and destruction over many years.
HOU1	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> If it is to occur, such a large influx of homes for North Walsham must surely be targeted to those in need, not be simply yet another large estate of flashy, 'executive' style homes which are dependent on car use.
HOU1	Bluss, Mr Andrew (1210045)	LP027	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Cannot see a dentist at my chosen surgery because they have vacancies they cannot fill. Professionals cannot, it seems, be attracted to North Walsham despite the growing number of residents (now and in the future). Planned demographics of

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				the residents due to live in this accommodation, what happens when the need for elderly care is required for those unable to live at home anymore? There is only one nursing home within North Walsham (Halvergate House) with limited availability within the remaining care homes. There is going to be a significant number of people who are going to need specialised care in their later years, putting an extra strain on an already overburdened healthcare system. This is a national problem but little or no provision has been made to account for this.
HOU1	Howe, Mrs Alex (1217494)	LP645	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There are 22 new houses currently being constructed in the Churchfield development and planning permission exists for a further 28 in the Tilia estate. These houses should be included within the required allocation of 150, reducing the new build requirement to 100. 6. Increasing number of second homes is creating an unsustainable need for new housing stock. Regulation and financial policies should be introduced to limit the growth of second homes, thus reducing the demand for new homes. 4. Ensure that the Church Field and Tilia developments are included in the 150 dwellings sought for Hoveton.
HOU1	Hull, Mrs Alicia (1210435)	LP763	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The pattern of out-of-town car dependent housing schemes, aimed largely for the wealthy and holiday houses and second home owners, with only a few so called 'affordable houses', has been destructive. It has added to pollution and congestion, got rid of green field sites, undermined village communities and made many locals homeless. Change to supporting rental accommodation at reasonable costs, built to minimum construction costs and minimum use of carbon for heating and cooking, and with all costs offset, so there is no overall carbon gain. Use widespread consultation and expert information to help devise the policy.
HOU1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052 )	LP254	Object	Paragraph 77 of the NPPF states that: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.' Paragraph 78 of the NPPF states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.' Policy SD3 does make limited provision for new development in Small Growth Villages. The policy states that: 'Small scale developments, including brownfield developments, community facilities and services will be permitted within the defined boundaries of the following Small Growth Villages.' Footnote 11 of the Plan notes that small scale developments are defined as infill development and new allocations of between 0-20 dwellings (to be selected in a Part 2 Plan). The policy goes on to note that: 'Outside defined development boundaries in areas designated as Countryside, residential development will only be permitted where it accords with other policies in this Plan. Or: 1. The proposal is for small scale development of typically no more than 5 dwellings; and 2. The site comprises of previously developed land; and 3. Development of the site would result in infilling or rounding off in a predominantly built up area.'

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				<p>We strongly suggest that this policy is overly restrictive and does not comply with paragraph 16b of the NPPF, which requires that plans should be prepared positively, in a way that is aspirational but deliverable. It is respectfully submitted that, as drafted, the Plan does not go far enough in enabling villages in North Norfolk to grow and thrive. It is well documented that shops and services have closed in many villages in recent years; this Plan should provide an opportunity to reverse that decline and should not artificially restrict housing to infill or densification in Small Growth Villages which do still have a range of facilities and provide a relatively sustainable location for future growth. Instead, it should provide the opportunity for Small Growth Villages to grow and attract new residents. It should provide a more flexible policy context in which development can be brought forward. Specifically, the existing provisions of the Plan should be replaced by a policy which states that developments of 0-20 dwellings should be permitted on land adjacent to settlement boundaries, or sites which are close to settlement boundaries, and are in sustainable locations.</p> <p>We have reviewed the 23 Small Growth Villages identified in the Plan, and believe that generally sites of twenty properties cannot be accommodated in these villages, where the settlement boundaries are drawn tightly, there is little land availability and there has already been infilling and densification of the existing built form. It is therefore likely that, in order to provide approximately 20 dwellings within the settlement boundaries of each of these villages as required by Policy HOU1, several, smaller sites could be required. Development of several, smaller sites is likely to have a greater impact in terms of impact on amenity on the existing residents and is unlikely to deliver any scale of infrastructure which could make a meaningful contribution to offset the impacts of development. Indeed, it is likely that many of the smaller sites will avoid providing any affordable housing, if they fall below the thresholds for affordable housing provision proposed by the Council in Policy HOU2.</p> <p>We suggest that the Policy should be amended to make provision to allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings. This would help to conserve the existing urban fabric of the villages, and would allow some controlled, sustainable expansion of the Small Growth Villages, which, as identified in paragraph 7.24 of the draft Local Plan, have a number of services, and act as limited service hubs for other nearby villages, thereby complying with the provisions of paragraph 78 of the NPPF. On this basis, my client's sites should be considered for allocation in Roughton. Land north of Chapel Road lies to the west of the existing settlement boundary, in an infill plot between the existing properties along Chapel Road. The Plan affords the opportunity to review the existing settlement and include these properties and my client's infill site within the boundary. The site lies in a highly sustainable location, only some 600m from the village centre and is connected by an existing pavement, enabling residents to walk into the village. Land east of Norwich Road lies adjacent to the settlement boundary, which is formed by the A140, and also lies within walking distance of Roughton's shops and services, and bus stops on the A140. We suggest that the Policy should be amended to make provision to</p>



Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings.
HOU1	Johnson, Mr & Mrs (1215700)	LP139	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Agree. It is pointless building homes on the coast to serve the local community if they are all snapped up by second home owners. That does not address the needs of the local community. That will just lead to continued demand for more housing. Second home ownership pushes up costs and demand for affordable housing. Second home ownership should be discouraged by charging full council tax, business rates where appropriate and by local occupancy clauses in developments. The acquisition of development sites by individuals for the purpose of second homes should be positively discouraged. There are many examples of homes of this nature on the coast built with inappropriate materials, out of character detailing and inappropriate size. Also too many overdeveloped sites are changing the character of the villages.
HOU1	Griffiths, Mrs Heather (1210796)	LP087	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Concerns about any significant development of new housing in Wells, due to the additional pressure on local infrastructure - particularly parking and the roads. We already have plans in place to restrict parking which means that people cannot park outside their houses. I suggest that we consider 'residents only' parking. I also question whether Wells has the amenities to support much more development. However, I do understand the need for limited development, and affordable housing in particular (which I believe should be restricted to local people only). Assuming that any approved development is sensitive to the local environment and contains all the basic infrastructure, I support the development at sites W07/1 and W01/1 as these would have the least impact on residents of the town and visitors.
HOU1	Dixon, Cllr Nigel (1218612)	LP738	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Stop the loss of housing stock to second, and holiday letting, homes across the District by introducing local primary residential conditions.

Individuals	Number Received	Summary of Responses (Policy HOU1)
Summary of Objections	32	Many commented that the overall housing target was too large and the governments standard methodology was not easily understood or appropriate. Many respondents focused on proposed growth levels in their own towns citing growth was not appropriate for a variety of reasons from lack of infrastructure and service provision , road network, countryside locations and impact on existing views, agricultural production and inadequate employment opportunities as well as affordability issues and the potential to be used as second homes. Some however objected due to the allocations not being large enough commenting that the target was not sufficient and more development should be allocated in the smaller service villages such as Blakeney, and that the small scale target for infill development of 400 was not

		sufficient . Scale of development in North Waltham, Cromer, Hoveton , Wells and South Reps were mentioned specifically as not appropriate, but for a variety of local issues. There was a strong sense that the local plan should only be seeking to meet the housing need locally generated and that the target is objected to because it does not seek to prioritise local occupation. Others however thought that restricting occupation was not enforceable and would not result in any net benefit or affordability and at least eased the burden of growth on the health service and surrounding services.
<b>Summary of Supports</b>	4	Support was expressed where appropriate housing types and where the target could be reviewed or revised in light of more up today household projections . Greater transparency was called for in the over all figure. Support for growth in Beeston Regis to accommodate over flow from Sheringham.
<b>Summary of General Comments</b>	16	General comments also focused on the high housing target and the potential impacts on services and perceived infrastructure limitations as well as percept impact on house prices due to the competing demands of second home owners. Other however supported the need for the target to be used as minimum to provide the appropriate type of housing to meet all needs. some comments focussed specifically resources while others made general comments around the suitability of North Walsham to accommodate such a high level of growth.
<b>Overall Summary</b>		Majority of respondents raised concerns that the housing target is too high and that the District cannot accommodate the proposed level of development due to constraints, lack of infrastructure capacity , road network, service provision etc. and the need to only address locally derived need . However a number of representations argued that the housing target should be considered as a minimum or arguably higher to provide the flexibility to deliver sufficient housing for the recognised need throughout the plan period. There is widespread views that the number of second homes has an adverse impact on the local housing market and in particular prices out local people and limits the type and tenure of properties that are available for local occupation and being built. A number wished to see the introduction of occupancy restrictions, but some acknowledge the difficulty in enforcing them and that they may not improve affordability.
<b>Council's Response</b>		Noted: Consider comments in the finalisation of the policy. The Local Plan seeks to address the Strategic needs of the District which are calculated using a standard methodology set out in national guidance. Local Plans should set out policies in order to address <b>all needs</b> , market, affordable, economic and social in line with national policy. Targets are set out as minimums. Plan making remains iterative and the target will be reviewed in line with evidence and the methodology in future iterations. Full details are published in background paper 1: The approach to setting the Draft Housing target. • Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts and provide flexibility • The distribution of growth is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and be prepared with the objective of contributing to the achievement of sustainable development in a positive way that is aspirational but deliverable. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. • The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need.

## Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU1	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerns re increase in traffic and impacts on quality of life of the parish of bacton including increased visitor pressure on bacton woods/ Witton woods- Inflating housing target in North Walsham just to reach infrastructure thresholds deprives other areas of the District of the ability to address infrastructure deficiency and represents an disproportionate amount of growth in the east. Targeting North Walsham to take so much of the bulk of the housing target, together with a disproportionately high density of growth villages in our part of the district, represents a poor attempt at forward planning, likely to have an unfairly detrimental impact on the geography of this part of the district, and quality of life of existing residents.	Noted: The distribution of growth is informed by the guiding principles of the NPPF , including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing , jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
HOU1	Blakeney Parish Council (1215955)	LP272	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Second Homes and change of use from residential to holiday accommodation - We would like these to be subject to a change of use application. Second Homes - We would like to see them levied with a higher Council Tax, which then goes back into the village, towards new affordable housing for local people. New Development - We would like new properties to be solely used as principle dwellings only, no new additional second homes. Local Employment	Noted: Use classification is a matter for law and is outside the scope of current land use planning. The Council is actively supporting the provision of rural exception sites and affordable housing provision through grant funding and working with local communities in the identification of and delivery of sites to address local

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<p>need. Such sites can also be brought forward through the emerging neighbourhood plan. The use of a second home is not defined in planning legislation, the occupation of residential dwellings is not a matter of land use planning and there are no planning controls that can be utilised to control the use of the existing housing stock as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. Blakeney is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers where there is an opportunity to bring forward additional growth in response to local issues and evidence.</p>
HOU1	Cley Parish Council (1217592)	LP646 LP650 LP655	General Comments	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Need to build 11 k houses to deal with future population growth, but this is largely driven by inward migration, not by growth of the existing North Norfolk population. What do we need to build to serve the needs of the local population? Why aren't we building just to cover these needs? Inward migration may change eg with the economy, so is it wise to base large future housing numbers on this factor? If all these new homes are built, how can the council as it aspires still provide increased access to the countryside and protect the environment? North Norfolk's economy is largely based on tourism, and this will be impacted by the effect of the new housing on our natural surroundings. North Norfolk will be a less attractive place to visit. Also, What about the impact of the new housing on the</p>	<p>Noted: Plans should be positively prepared to meet all development needs as a minimum. The Council is supportive of Local communities bringing forward additional growth to support local identified need through neighbourhood planning. The housing numbers make an allowance for windfall development.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				<p>infrastructure visitors use, eg the roads. - States historically windfall development has provided a substantial number of homes and there is no evidence to say this will decrease, but they are reducing your expectation by 50%. What is the basis for this? Surely windfall development reduces the number of new homes needing to be built. - Healthcare, parking and education are all constraints in Holt. How are these going to be tackled? For instance 330 more homes requires more doctors, how will this be achieved?</p>	
HOU1	Northrepps Parish Council (1218479)	LP789	Object	<p>Members do not support the need for any additional housing in Cromer. If more housing is actually required, brownfield sites should be developed and empty properties brought back into use before any additional housing is considered especially in the countryside and the AONB. • Members noted the comments put forward by CPRE</p>	<p>Disagree: The housing target and distribution of growth is informed by the guiding principles of the NPPF, including the NPPF's aims of boosting significantly the housing supply and with regard to level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. This includes through planning making sufficient provision for housing ,including affordable housing. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further</p>

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					detail is published in background paper 2. Cromer itself functions as a higher order town and provides significant housing , employment and services to residents of the town and District.
HOU1	Wells Town Council (1212319)	LP098 LP103	Support	The Council accepts the allocation of eighty dwellings for the town as part of its share of government housing requirements for the District. The Council supports the building of affordable housing over the plan period up for the full number remaining as required by the District	Support noted. The Council considers it important to retain land supply solely for employment uses.

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

## Policy HOU1 - Housing Targets for Market & Affordable Homes

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

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				<p>the broad housing figures, it is suggested that Local Plan period should be amended to 2018-2036. It is also suggested, for clarification purposes, that there should be further explanation contained in the Plan setting out how the housing figures (per annum) have been derived and how this reflects the Government's methodology. While the County Council supports the broad housing target set out in the Local Plan, it has some concerns with the above approach of not setting a final housing provision target until closer to the Local Plan's submission. This approach creates a degree of uncertainty and the potential for change in respect of site allocations etc. This in turn makes planning for County Council infrastructure difficult. The County Council as with other infrastructure providers needs greater certainty on the level of housing and its specific location in order to be able to plan for its own infrastructure requirements including, for example, transport; schools; libraries etc. 3.4. Therefore, the County Council would like to see further clarification on the level of housing proposed and the derivation of any final housing provision target. The County Council broadly supports the settlement hierarchy (Policy SD3) and distributions of housing growth set out in Policy HOU.1. These comments, however, are subject to the County Council undertaking a further detailed technical assessment of individual site allocations in respect of: • highway/transport matters; and • flood risk/surface water drainage issues. EDUCATION - Children's Services (CS) – The level of housing proposed in the emerging Local Plan (Policy HOU.1) and its distribution, as set out in the Settlement Hierarchy (Policy SD3), does not raise any fundamental concerns to Children's Services subject to securing appropriate developer funding towards the improvement of existing schools or the provision of new school/s through Policy SD 5.</p>	<p>no1 . The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan. The Council has used current evidence base and engaged with Children services to identify where additional social infrastructure may be required in order to ascertain the level of support as a result of new development.</p>
HOU1	Gladman Developments, Mr Craig Barnes (1217131)	LP277	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Policy HOU1 sets out that over the plan period the Council will aim to deliver between 10,500 and 11,000 dwellings. Gladman consider that the policy as drafted fails to reflect the approach of national planning policy and as such is unsound. Firstly,</p>	<p>Noted - Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and</p>



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				<p>the lower end of the range identified in the policy at 10,500 dwellings is below the Local Housing Needs assessment currently identified for the District. Though the difference is marginal, national planning policy is clear that the housing need figure indicated by the Standard Method forms the absolute minimum housing requirement; Secondly, the policy is unsound due to the use of the word “aim”. Gladman consider that this language is too loose and departs from national planning policy which is clear that in order to meet the tests of soundness the authority should seek to meet the authority’s OAN. The housing requirement must be expressed as a minimum. It is only where the constraints of the authority area prevent full delivery of housing need should a lower housing requirement be adopted than the standard method. Where this is the case, the Council is required to engage the Duty to Cooperate in order to ensure that any unmet need is accommodated by neighbouring authorities. In the case of North Norfolk, the level of supply planned is above the level of housing need and as such, the constraints of the District do not therefore, in the Council’s view, form sufficient justification not to meet the identified housing need in full. This is confirmed within the Norfolk Strategic Planning Framework with each LPA confirming that they will meet their own OAN - HOU1 sets out the proposed distribution of development across the District. In broad terms, Gladman consider the proposed distribution to be sound. The total level of development proposed at each settlement reflects the position of that settlement within the settlement hierarchy as set out in Policy SD3. Broadly, settlements within the Large Growth Towns are to accommodate a higher level of development than those settlements designated as Small Growth Towns. etc. There are examples of settlements which receive proportionately more or less than other settlements which are included within the same tier. Gladman consider this to be a sound approach taking into account the constraints and opportunities of settlements and their functionality and connectivity with other settlements. In particular, Gladman welcome and support the Council’s proposal for 823 dwellings to be</p>	<p>allocations is provided in future iterations of the emerging Plan. Consider feedback and clarifications requested in the finalisation of the approach including the use of a minimum housing target, the consideration of a 20% buffer in terms of housing numbers and the exclusion of windfall within the first three years of the housing trajectory along with clarification of the expected supply.</p>

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				<p>accommodated at Holt. The level of housing identified for the town reflects its role within the wider rural central part of the District, responsive to the constraints such as the AONB and reflects land availability &amp; opportunities to address existing infrastructure capacity issues. Policy HOU1 advises that part of the housing requirement will be made up from windfall sites. This is permitted by the NPPF where there is a record of historic delivery from windfall sources and policy makers are satisfied that contributions from windfall supply is likely to continue. Gladman do not therefore object to the inclusion of a windfall allowance within the supply provided this is sufficiently justified. A total of 2,295 dwellings is expected by the Council at windfall sites . This equates to an average of 135 dwellings per year representing roughly a quarter of the proposed housing requirement. Evidence illustrating the rate of windfall delivery in North Norfolk is provided within Appendix B of the 2017/18 Interim Statement of Five-Year Land Supply. No detail is however provided to support these figures. It is therefore unclear whether this rate includes garden development now resisted by policy. Gladman acknowledge and welcome the discount made by the Council towards the contribution likely in the future from infill sites, redevelopment and change of use. This rightly recognises the change in local policy which reduces significantly the locations in the District where development would be permitted. Windfall development is however by its nature uncertain and forms a diminishing source of housing land supply. Gladman would expect that as part of the plan preparation process some of these potential sources for windfall may have been assessed and potentially allocated for development through the Draft Plan. The rate of windfall delivery may therefore be expected to automatically reduce over the course of this plan period in comparison to historic levels of delivery. - Indeed, owing to changes in national planning policy, there is now a need to review the potential deliverability and allocate smaller sites through the Local Plan process to provide 10% of the supply on sites of less than 1 hectare . It is however unclear from the Council's evidence how this change in national planning policy has</p>	

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				<p>been considered by the Council in its review of Windfall development. The absence of such a review is a flaw in the evidence given the potential over estimation of windfall supply on account of double counting allocations made through the Local Plan. Notwithstanding the above comments, should the Council apply the suggested change in direction to Policy SD3 in its treatment of development proposals located beyond settlement boundaries as set out in Section 4.2 of this representation, then the prospect for full delivery of the identified windfall allowance would be substantially increased owing to the greater scope provided for windfall development. - Gladman's final concern with the windfall allowance is the contribution made towards the short-term housing land supply. The table shows that a windfall allowance is made from 2019 to the end of the plan period. Whilst windfall development will inevitably occur in the short term, the inclusion of a windfall allowance from year 1 of the five-year period significantly increases the risk of double counting. This is because the committed supply will include sites considered as windfall, but which have yet to deliver. The Council however count the delivery from these sites in its windfall allowance, as well as being an existing commitment for the entirety of the five-year period. The approach is therefore unsound and provides for an artificial and untrue inflation of the housing land supply. The table in Policy HOU1 illustrates that in total a supply of 11,611 dwellings is to be provided over the plan period. This includes contributions made by completions, committed development, allocated sites, and windfall site. Based on the Council's position, 611 dwellings will be delivered in addition to the upper range of the housing requirement. The supply proposed provides a 7% buffer in excess of assessed housing need. Gladman is supportive of the aim of the Council to deliver its locally assessed housing needs figure in full. Gladman however question whether there is sufficient flexibility provided within the supply to ensure full delivery of the housing requirement over the plan period. As set out above, Gladman question whether there is evidence to support the level of windfalls expected by the Council over the plan period. Furthermore, as set out</p>	

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

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				be increased to provide for a 20% buffer against the housing requirement as a minimum. Based on the above position, Gladman consider that there is a need for further sites sufficient to accommodate around 2,150 additional dwellings. The Council should also ensure that a housing trajectory is published as part of the publication version of the Local Plan, to provide transparency on how it assumes the Local Plan will be delivered in order to demonstrate its deliverability and effectiveness.	
HOU1	CPRE (Mr Michael Rayner) (1204056)	LP296	Object	We consider that there is no reason why new sites allocated in the Local Plan should not be phased. They would then be available for development should building rates increase and the vast majority of existing allocated sites are built-out, but if house completions remain at existing rates these newly-allocated sites could stay on a reserve list and valuable countryside would be protected. This would be particularly important if Government predictions of population and household growth are reduced further. We note that a number of proposed allocated sites in the new Local Plan are already in the existing Local Plan. These sites should be prioritised (along with any currently unallocated brownfield sites) to be developed before other newly allocated sites and would not need to be put onto a reserve list. This reserve list would be for sites which have not been previously allocated in the existing Local Plan. Twenty Parish Councils across the District support this proposal as demonstrated by their signed pledges (copies posted to NNDC) as part of the CPRE Norfolk Alliance. Brownfield First. We acknowledge that the NNDC's Brownfield Register has only 9 sites on it for a total of 131 houses. These should be prioritised for development and need not be placed on a reserve list	Comments noted: Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.
HOU1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP559	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Housing Requirement para 9.16 - the Council has assessed its local housing need to be 543 homes per year which equates to 10,860 homes over the 20 year plan period. Background Paper 1 'Approach to setting the Draft Housing Target' identifies at	Comments noted : Consider comments in the finalisation of the housing targets and site approach to Wells • The distribution of growth is informed by the guiding principles of the NPFF, including

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				<p>Figure 3 that if the 2018 mean affordability ratio is applied to the calculation of the standard methodology the housing needs increase to 553 dwellings per annum, equates to 11,060 homes over plan period. It is stated Council aims to deliver between 10,500 and 11,000 new homes over the period however using the most up to date data it is advised that the Council plans to meet the need of at least 11,060 new homes over the emerging plan period. para 10.63 states that "The Council recognises the importance of maintaining vibrant and active local communities during off-peak tourism months and of striking a balance between providing permanent housing for local people and providing tourist accommodation to support the local community." It is considered that this is a key consideration. It is recommended that a detailed assessment of Tourist Accommodation and the interrelationship with residential properties is commissioned. Housing Supply table at Policy HOU1 suggests that an allowance for approx. 5% buffer (11,611 dwellings compared to up to date need figure of 11,060 homes). It is suggested that the Council increases this buffer through the identification of additional sites for allocation. Position regarding the supply is as follows: • Completions (1st April 2016 to 30th January 2019) = 1,200 dwellings • Commitments (January 2019) = 3,252 dwellings • Total = 4,452 dwellings In order to meet the Council's stated aim to deliver 11,000 new homes it would be necessary to identify new sites to accommodate a further 6,548 dwellings. However the Council is only proposing sites sufficient to accommodate 4,864 dwellings and is reliant on 2,295 dwellings to be brought forward as windfall development. Whilst this allows a degree of flexibility for sites to come forward, there is less certainty about the deliverability of new homes within the plan period. Paragraph 70 of the NPPF makes it clear that the Council needs to have compelling evidence that windfall sites will provide a reliable source of supply and consequently the District has to be realistic in such a position bearing in mind the scale of windfall it assumes will come forward and the importance of such an element as part of housing land supply. It is</p>	<p>that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. * Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.</p>

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				<p>requested that the Council produces a Housing Trajectory to demonstrate how and when new homes, commitments and suggested allocations will deliver across the plan period in accordance with paragraph 73 of the National Planning Policy Framework. It certainly remains the case that the provision of new homes is a key priority with the NPPF and as set out in paragraph 59 of the NPPF confirms that it remains imperative that a sufficient amount and variety of land comes forward to meet the Government's objective of significantly boosting the supply of homes. In order to provide increased certainty it is requested that the Council reconsiders the potential Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. The Large Growth Towns are anticipated to receive 47.12% of all growth. In comparison, the Small Growth Towns are only anticipated to receive 17.04% a much smaller proportion of growth particularly when compared to the expected 19.76% growth to come forward as windfall development. Paragraph 6.8 of the Background Paper 1 'Approach to setting the Draft Housing Target' states "At any given time, between 8% and 11% of dwellings in North Norfolk are not available as permanent dwellings, although this figure is much higher in many of the coastal communities between Sheringham and Wells." This suggests that there may be a need to specifically increase the amount of housing directed to Wells-next-the-Sea to meet the needs of local people. It is requested that the Council reconsider its approach to housing distribution at Wells. In addition, the Council's Background Paper 2 'Distribution of Growth' states: "At a local level, 915 people on the housing waiting list have expressed a preference for living in Wells-next-the-sea, of which 55.19% require a 1-bed property with a further 28.96% requiring a 2-bed property. There are a total of 134 people on the housing waiting list with a local connection to Wells-next-the-sea and 76 people who currently live in Wells-next-the-sea. Of these two groups the vast majority, 49.25% and 52.63% respectively, require 1-bed properties." (Page 54) Despite the above suggestions that there is a need for more</p>	

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				<p>housing to be directed to Wells, the Council notes that the settlement is constrained by environmental considerations which has influenced the Council's approach to the distribution of housing at Wells. Whilst we acknowledge there may some environmental constraints, we also consider that the site put forward by the Holkham Estate at Warham Road can be designed in such a way to minimise its impact bearing in mind the sensitivities of other edges of the town which in our view have more significant impacts. In such a context, it is noted that the majority of ecological designations are situated to the north of Wells. The Council's current evidence base, HRA recognises that further assessment of all the proposed allocations is required going forward. If it is found that Wells is capable of accommodating additional development it should do so to better respond to the need for housing and to seek to reduce the impact of residential properties being used as holiday accommodation. We consider that the reference should be made to "approximate" number of dwellings within the table in HOU1. In respect of Wells, the Council is asked to consider more dwellings in the town and which is our view would not impact upon the broad thrust of the polices in the plan.</p>	
HOU1	<p>Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning)</p> <p>(1218427, 1218424)</p>	LP746,LP755	General Comments	<p>Paragraphs 9.7 and 9.8 Consistent with our comments on policy SD3 above it is considered that the Local Plan should allow for infill housing. The safeguards imposed by the criteria from Policy SD3 together with other policy controls will be sufficient to control against inappropriate or harmful developments. They would however enable and encourage the provision of modest infill schemes of housing which could help sustain existing small settlements and support local service provision in an area characterised by a dispersed pattern of development and variable levels of service provision. It is also consistent with the Government's support, through paragraph 68 of the NPPF, for small sized sites which can be built-out relatively quickly</p>	<p>Comments noted : Development is directed towards the selected settlements outlined in SD3 • The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel.</p>



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HOU1	Rentplus UK Ltd (Mrs Meghan Rossiter, Tetlow King Planning)  (1217083, 1217080)	LP262	Support	We support the Council in setting a separate minimum target for the delivery of affordable housing over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.	Support noted
HOU1	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning)  (1218489, 1218491)	LP803	General Comments	The housing target for the plan period is described by Policy HOU1 as being "between 10,500 and 11,000 new homes over the plan period". This is based on a figure derived from the District's annual local housing need of 543 dwellings per annum, resulting in a precise requirement for the 20-year plan period of 10,860 dwellings. As a start point paragraph 60 of the NPPF states that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance...". To this end, the use of a range to describe the housing target for the plan period, starting at 10,500 dwellings, conflicts with the requirement of the NPPF that the local housing need of 10,860 should be a minimum. Secondly, the Council's own evidence base (Background Paper 1: Approach to Setting the Draft Housing Target, Figure 3) describes that, using the most up-to-date affordability ratio for the District, the annual local housing need figure actually increases to 553 dwellings per annum, resulting in a revised requirement for the 20-year plan period of 11,060 dwellings. To ensure that the Plan complies with the NPPF and plans for the delivery of this number of homes as a minimum this figure must comprise the lowest end of the range forming the District's housing target. It is also noted that the Council's adoption of the raw local housing need figure as the housing requirement for the plan period fails to consider any additional economic or social factors that may necessitate an additional uplift in the target. Paragraph 2.11 of Background Paper 1 states that "the Council has concluded that because of the large size of the uplift resulting from Stage 2 of the standard methodology, further upward	Comments noted :Phasing Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider comments in the finalisation of this policy.

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				<p>adjustments beyond the OAN requirement are neither necessary or supported by the evidence". Whilst we acknowledge that the local housing need figure already includes an adjustment to account for affordability issues of approximately 35% this in-built uplift is purely intended to balance existing pressures on the local housing market – it responds to current market conditions only. It does not therefore account for any future increase in housing demand because of economic growth strategies, unmet needs in adjacent districts or the requirement to meet affordable housing targets. Whilst the baseline housing need set out in the Council's Strategic Housing Market Assessment (SHMA) has since been superseded by the local housing need figure the document's assessment in relation to market signals uplift therefore remains relevant. Figure 96 of the SHMA identifies that, above and beyond demographic projections, an upward adjustment of 593 additional dwellings will be required prior to 2036 to allow a balancing of supply to account for the Norwich City Deal as well as broader market signals. Added to the updated baseline local housing need figure this would result in a revised housing target for the plan period of 11,653 dwellings. To this end Alternative Option 2 (HOU1B), referring to a housing target of 12,000 dwellings, should be included in the Plan to adequately address the objectively assessed needs of the District. Housing supply Firstly, and most fundamentally, it is noted that the supply across all sources detailed in Policy HOU1 amounts to 11,611 dwellings for the plan period. This figure falls below both the revised housing target of 11,653 set out above as well as the rounded target of 12,000 homes described by Option 2 of 'First Draft Local Plan (Part 1) Alternatives Considered' background paper. Allied with a significant reliance on unidentified windfall sites – 2,295 dwellings, or approximately 20% of supply – it is clear that there are sufficient grounds for concern that the plan presents no certainty that the minimum housing requirement can be achieved. This shortcoming should be addressed through the inclusion of additional demonstrably deliverable allocations across the District within both the LPP1 and forthcoming LPP2. We also have specific concerns in respect of the</p>	

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				<p>ability to achieve a minimum of 2,150 new homes at North Walsham by 2036, a figure which represents approximately 40% of all new homes to be delivered by way of new allocations. We understand that significant concerns are harboured by members of the development industry and Officers alike who universally regard the target for North Walsham as challenging. Growth at the town is to be delivered across two substantial sites of 350 and 1,800 dwellings respectively. The respective draft policies covering each site require the preparation of a comprehensive development brief to lead the schemes, to be agreed by the Council before any permission can be granted. The brief for the 1,800 dwelling site must also be subject of its own separate public consultation. Unusually for a comprehensive draft plan the LPP1 is not currently supported by any form of suggested housing trajectory demonstrating the rate at which new homes will be delivered at these sites or across the District as a whole. This conflicts with the requirements of paragraph 73 of the NPPF, that strategic policies should include evidence illustrating the expected rate of housing delivery over the plan period. Lack of such a trajectory suggests that the Council are not entirely confident in the ability of some of their sites to deliver within the plan period. . In the absence of the Council's own projections we have undertaken our own analysis of delivery at the North Walsham sites to understand how realistic the estimation is that over 2,000 homes can be delivered at the town by 2036. In terms of timescales, and drawing on the same evidence as before, we would anticipate that it is highly unlikely that first completions will take place on site until at least 2027. This accounts for the time taken to agree the development brief, the gestation period of any planning application and the delivery of up-front infrastructure.</p> <p>In respect of delivery it is once again expected that market interest in the site will be low. The up-front infrastructure cost will inevitably be substantial and the likely timescales until first delivery will require a significant level of developer commitment and faith in the continued buoyancy of the local housing market to see the project to fruition. At</p>	

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				<p>most we do not consider that more than two developers will be on site at any one time due to the presence of the other North Walsham allocation, with each developer delivering at a similar rate as stated above – approximately 40 dwellings per annum totalling 80 dwellings per annum across the site. This build rate would therefore represent a significant shortfall in delivery over the plan period, of just over 1,000 dwellings. The LPP1 is proposing a level of growth at North Walsham that is entirely unrealistic and certainly more than the market can accommodate. Based on our assumptions that first delivery will take place at the town in 2025 this would require the completion of 195 dwellings per annum across both sites. The average rate of completions at the town over the last 6 years is 56 dwellings per annum.</p> <p>On the basis that an individual housebuilder delivers at the rate assumed by the Council’s most recent Housing Land Supply Statement (June 2018) – that is a maximum of 40 dwellings per annum – this would require the involvement of a minimum of 5 separate developers active at the town at any one time. This scenario in itself is entirely unrealistic considering both the low numbers of volume housebuilders active in the District and the level of competition this would create at the town.</p> <p>Our client therefore has concerns that the Council’s heavy reliance on delivery at North Walsham will result in a significant deficit in housing supply across the plan period as a whole. Our estimate is that this would be in the region of 1,000 dwellings. In addition, neither site should be relied upon to contribute towards the delivery of new homes during the first five years of the plan period due to the extensive lead-in time prior to first completions . Suggested amended policy wording</p> <p>To ensure that the LPP1 plans for the correct level of housing need across the District the housing target should be revised and the first paragraph of Policy HOU1 amended to read as follows:  “The Council will aim to deliver between 12,000 and 12,500 new homes over the plan period 2016-2036. A minimum of 2,000 of these</p>	

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				<p>will be provided as affordable dwellings. To achieve this specific development sites suitable for not less than 5,250 new dwellings will be identified as follows..."</p> <p>This includes a requirement to deliver a further 750 dwellings on new allocations across the District to account for the uplift.</p> <p>In addition, the distribution of development should be amended to take into account the likely deficit in delivery at the North Walsham Western Extension. This would result in around 1,000 dwellings being redistributed across all other settlements in the hierarchy.</p> <p>Proportionately, the requirement to deliver 1,750 additional homes across the remainder of the settlement hierarchy, away from North Walsham, would require approximately 150-200 homes to be delivered by way of allocations across the 15 most sustainable Small Growth Villages identified earlier in this submission</p>	
HOU1	Norfolk Coast Partnership, Ms Gemma Clark  (1217409)	LP517	General Comments	<p>9.8 The Norfolk Partnership have undertaken a study of the issues of second homes which is available. A high proportion of second homes does affect the vibrancy and sustainability of local communities and we suggest that there is a policy restricting numbers of second homes, as has been implemented elsewhere in the country.</p>	<p>Comments noted: Occupation of homes is not a matter for land use planning and there is no justification for the limitation of occupation in national planning policy.</p> <ul style="list-style-type: none"> <li>• Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts</li> </ul>
HOU1	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP682	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Larkfleet comment that regardless of the uncertainty regarding the figures of housing need and supply, North Norfolk still require new development to support the distribution of growth within the region. They comment that the background paper 1 (Approach to Setting the Draft Housing Target), submitted as evidence for the DLP suggests the new Plan requires the consistent delivery of around 550 dwellings per annum (somewhat lower than the SHMA figure) and comments that the deliverability of this figure has rarely</p>	Comments noted.

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				been achieved in the past. Whilst the Council considers that the figure of 550 units per annum is appropriate bearing in mind the use of the Standard Methodology, this is likely to change as the Government has indicated it will amend it shortly.	
HOU1	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP161	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Persimmon Homes (Anglia) suggests that the DLP's approach to only deal with the Objectively Assessed Housing Needs (OAN) plus the affordability adjustment is perhaps a little conservative, given the identified housing need in Hoveton; second homes rates in the district; the need to support employment growth; and the potential for certain settlements to accommodate 'cross boundary' growth needs, where settlements are more constrained, for instance Wroxham. Persimmon Homes (Anglia) suggests that the Plan should be accommodating around 40% more than the projected household formation/demographic based requirement, rather than the current 35%. This additional 'buffer' would help to further mitigate the impact of second homes in the area; provide opportunities to meet cross boundary growth needs; assist with dwelling affordability and take account of changing affordability ratios; help deliver additional affordable homes; and address the potential needs of a growing workforce. It would also act as a 'buffer' should identified housing sites/windfall etc. not come forward at the anticipated rates.</p> <p>Persimmon Homes (Anglia) accepts that the Plan, as explained by the Background Paper, seeks to address the District's Objectively Assessed Housing Needs (OAN) in full, with an adjustment for affordability. Persimmon Homes (Anglia) also accepts that the Plan's final housing target is not yet finalised.</p>	Noted: Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. The Council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.
HOU1	Richborough Estates (Mr Tom Collins, Nineteen 47)	LP662	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Richborough Estates support the approach to focusing development on North Walsham, as the largest and most sustainable settlement, but a wider range of allocations are required</p>	Disagree. The development brief for the SWE will provide further certainty on delivery. Plan making is iterative - Housing Trajectory and Phasing is beyond the

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	(1217387 & 1217389)			to reduce the risk arising from over-reliance on a single Sustainable Urban Extension to deliver the significant majority of housing.	scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.
HOU1	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is acknowledged that the housing need figure for the District accords with the national standard method (543 dwellings per annum); supports consistency with the national Standard Method and supports the provision of at least 680 new homes at Fakenham. 2.2.15 However, the total growth at the Large Growth Towns (5,471 homes) falls slightly under the majority (as noted in Policy SD3) given that the Council aims to deliver 10,500-11,000 new homes. The proposed allocations, such as site F03, will therefore be necessary to meet the housing need in these towns. The impact of windfall sites is unclear and should not be relied upon – further clarity and evidence should be provided regarding windfall sites, consistent with NPPF paragraph 70.	Support noted. Consider feedback and clarification on windfall requested in the finalisation of the approach
HOU1	Firs Farm Partnership (Ms Becky Rejzek, Lanpro)  (1218497 1218496)	LP805	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard national methodology. We note the Council's concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and "this figure has rarely been achieved in North Norfolk" (paragraph 6.14, Background Paper 1). In our view this makes the identification of an adequate range of sites, particularly smaller sites within the Small Growth Villages like Sutton all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront	Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

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				<p>infrastructure before house building can commence. Therefore, we consider it is important to allocate a sufficient number of smaller sites and this site at Sutton is immediately available and deliverable to help meet this requirement. Furthermore, we consider that the Council should treat the 10,500 – 11,000 homes as a minimum number to be exceeded in terms of identifying an appropriate number of allocations.</p>	
HOU1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP620 LP622	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Provides the framework for housing delivery through the Plan period and identifies the C10/1 allocation. As per our response to policy DS 3, we support the identification of site C10/1, land at Runton Road / Clifton Park, Cromer. Further evidence to support the delivery of site C10/1 is included in the accompanying Delivery Statement. Supports the Plan's aim to address the Objectively Assessed Housing Needs (OAN) in full. However, the Council may wish to consider whether a further uplift is required, given the identified housing need in Cromer (1,479 people on the housing waiting list expressing a desire to live in Cromer); second home rates in the district, the need to support employment growth in North Norfolk and the wider area; the need for the plan to take account of the latest affordability ratio (2018) published earlier this year; and to potentially address the under delivery that has occurred in previous years. Whilst we note that the Plan's housing target is not yet finalised, and some of these issues may be taken into account as the Plan progresses, the Council may wish to consider whether an uplift of 40% more than the projected household formation/demographic based requirement would be appropriate, given that this is a relatively modest increase above the 35% uplift currently proposed. This additional 'buffer', would help to further mitigate the impact of second homes in the area; assist with dwelling affordability and take account of changing affordability ratios; help to deliver additional affordable homes; and address the potential needs of a growing workforce within North Norfolk and neighbouring authorities, including potentially North Norfolk's contribution to help</p>	Support noted. Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.



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				<p>meet the Norwich City deal, if the uplift in housing numbers to support the City Deal cannot all be met within the Greater Norwich area. It would also act as a further 'buffer' should identified housing sites/windfall etc., not come forward at the anticipated rates; and potentially to take account of previous housing under delivery. A 40% uplift would equate to 563 new homes per annum (11,260 over the Plan period), which would help to bring the housing requirement more in line with the Strategic Housing Market Assessment (2017) figure of 574 dwellings per annum, which the SHMA suggests could be required to plan for growth arising from the Norwich City Growth Deal. We have also reviewed the Background Paper 2 Distribution of Growth. Pigeon supports the Council's assessment of Cromer as contained in the Plan and background material. Cromer provides a range of services, facilities, and a considerable range of job and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel long distances, particularly by the private motor car. Walking, cycling and public transport are all viable options for travel for people to meet their day to day needs, with many of Cromer's services, facilities and opportunities within walking and cycling distance of all parts of the town; and for travel beyond the town, regular bus services are available to Holt, Sheringham, North Walsham and Norwich; and regular train Services are available to Cromer, Sheringham, North Walsham and Norwich. As such we support the growth target for 909 new homes in Cromer over the plan period (592 on new allocations). However, as per our response to policy SD3, the Council may wish to consider whether more growth should be directed to Cromer given the extensive employment opportunities in the town (including the headquarters of North Norfolk District Council, which is a significant employer) and the number of people on the Council's housing waiting list who have expressed a preference for living in Cromer. Notwithstanding, the comments above, we confirm that land at Runton Road/Clifton Park (site C10/1) is capable of delivering approximately 90 homes as part of a mixed-use scheme that will contribute to the housing target set out</p>	

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				within policy HOU1, as set out in the Delivery Statement that accompanies this submission.	
HOU1	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>Paragraph 9.16 states that its local housing needs assessment is 543 homes per annum - 10,860 homes over the plan period. On the basis of this level of housing needs the Council have set a housing requirement in HOU1 of between 10,500 and 11,000 new homes between 2016 and 2036. Whilst we consider the Council to have applied the standard method correctly, we note that this assessment uses the median affordability ratio from 2017 rather than the 2018 ratio that were published earlier this year. We would agree with the later assessment of needs and it will be important that the Council plan for this higher number. PPG states that Councils can rely on this figure for two years following submission. However, if further evidence is published prior to submission the Council will need to reconsider is housing needs to ensure consistency with paragraph 60 of the Framework and its associated guidance. The Council recognise in the local plan that the standard method results in the minimum level of housing needs. Councils must therefore consider, as established in paragraph 60 of the NPPF and paragraphs 2a-010 and 2a-024 of PPG, whether the level of housing delivered will need to be higher in order to:</p> <ul style="list-style-type: none"> <li>• Address the unmet needs arising in neighbouring areas;</li> <li>• Support the delivery of growth strategies or strategic infrastructure improvements; and</li> <li>• Help ensure the delivery of the Council's affordable housing requirements Unmet needs Whilst it would appear that there are no unmet needs within neighbouring authorities at present it will be important for the Council to continue to monitor this situation through statements of common ground. Should it become evident that there is likely to be unmet needs arising within any neighbouring areas the Council will need to consider increasing its housing requirement. Economic growth. Paragraph 9.17 has considered whether employment growth within the Borough will require in uplift to the baseline housing needs assessment resulting from the standard method. The Council note in 'Background Paper 1' that they do not expect economic activity to</li> </ul>	Noted - Plan making is Iterative -Housing Trajectory is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider feedback and clarifications requested in the finalisation of the approach including the use of a minimum housing target, the target for affordable homes, windfall assumptions and the consideration of a 20% buffer in terms of housing numbers.

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				<p>change over the plan period. However, the Council continue to seek increased economic activity through the allocation of an additional 93 ha of employment land in policy ECN1, which when developed will generate a substantial number of new jobs. The Council will need to consider the impact of these allocations on jobs growth in North Norfolk and the whether an uplift in the Council's housing requirement is needed to ensure there are sufficient working age people to support these aspirations. Alongside this the Council will need to consider the areas ageing population and the fact that this sector of the population will lead to a shrinking workforce and potentially increase the need for housing growth beyond the established baseline. The Council outline in HOU1 their intention to deliver a minimum of 2,000 affordable homes over the plan period. What is not clear from the Local Plan or the Council's evidence base is whether this level of delivery will meet the affordable housing needs for North Norfolk. The Central Norfolk SHMA identifies the need for 17,450 additional affordable homes between 2015 and 2036. However, we could not find within the SHMA a separate breakdown of the need for affordable housing within each LPA covered by this assessment. The Council must state how many affordable homes are needed during the plan period to meet its own needs and the degree to which its proposed housing requirement and affordable housing policies will meet this need. If affordable housing needs are not being met in full then the Council will have to consider increasing its housing requirement to better meet affordable housing needs as mandated by paragraph 2a-024 of Planning Practice Guidance. Recommendations</p> <p>Firstly, any housing requirement must be stated as a minimum to ensure that this figure is not seen as a cap beyond which further development should not be delivered. Secondly, further evidence will need to be provided with regard to affordable housing needs and economic growth and whether either of these factors will require the Council to increase its housing requirement in HOU1. Housing Supply (HOU1) Policy HOU1 sets out in table 1 that the Council expects to deliver 9,316 new dwellings through existing permissions and new</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>allocations. In addition to this supply the Council expects a further 2,295 homes will be delivered through windfall sites delivering a total of 11,611 new homes across the plan period. Whilst the HBF does not comment on the deliverability of specific sites we do consider it important that reasonable assumptions are made with regard to the deliverability of allocated sites and that windfall assumptions are justified. Whilst the Council will be aware that paragraph 73 the 2019 NPPF requires Local Plans to include a housing trajectory we also consider it helpful to include within the plan, or supporting evidence, detail of how each allocated site delivers over the plan period. In our experience this helps not only those commenting on the local plan but also the inspector tasked with examining it. Windfall The NPPF allows windfall to be included in anticipated delivery where there is compelling evidence that they will form a reliable source of supply. The Council's statement on five-year housing land supply indicates that the level of windfall is expected to be 135 dpa. This accounts for 22% of the homes expected to be delivered over the remaining plan period - 2019 to 2036. Whilst we recognise that delivery on windfall sites has been high in previous years the plan should be seeking to reduce the level of windfall and increase the number of small site allocations within the local plan in line with paragraph 68 of the NPPF. This requires the Council to identify in the development plan sites of less the 1ha that will deliver a minimum of 10% of its housing requirement. We would therefore recommend that the Council seek to allocate smaller sites across the Borough and reduce the level of windfall expected to come forward. This would provide greater certainty in the delivery of new homes with North Norfolk and allow any windfall to be considered a bonus rather than a necessity. Flexibility in supply The Council's proposed supply indicates that the Council have 5.5% buffer across the plan period. This is insufficient and provides limited flexibility within supply should any of the proposed allocations not come forward as expected. We would suggest that the Council needs to allocate further sites and reduce its reliance on windfall. We generally recommend that Councils identify</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				delivery (including windfall) for at least 20% more homes than the stated housing requirement. Recommendations Whilst the Council states it has sufficient supply to meet its housing needs over the plan period, we do not consider there to be a sufficient buffer to for such a statement to be made with any certainty. At present the Council is reliant on high level of windfall to come forward in order to meet needs and has limited flexibility should delivery not come forward as expected. We would therefore suggest that the Council allocates sufficient sites to ensure a 20% buffer across the plan period to provide the necessary certainty that its housing needs will be met.	
HOU1	Glavenhill Ltd (Hannah Smith, Lanpro) (1218811)	LP736	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported by Glavenhill Limited together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard National methodology. Glavenhill note the Council's concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and "this figure has rarely been achieved in North Norfolk" (paragraph 6.14, Background Paper 1). As such, and in order to give the Council the best chance of meeting its identified housing needs, Glavenhill consider that the Council should allocate sufficient sites to meet a minimum of 10,500 – 11,000 homes over the plan period. Furthermore, the setting of this target makes the identification of an adequate range of sites, particularly smaller sites within the Small Growth Villages like Badersfield all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront infrastructure before house building can commence.	Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan
HOU1	WSP Indigo, Miss Emily Taylor	LP632	Object	In the context of the national housing shortage, with a need for as many as 340,0001 new homes to be built per year, there is serious	Consider comments in the development the policy approach. The Draft Plan seeks

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1217127)			<p>and immediate pressure on Local Planning Authorities (LPAs) to deliver adequate amounts of land for housing. The housing need in North Norfolk has increased substantially compared to its historic requirement and levels of delivery. Previously the Council's Local Plan requirement amounted to 400 dwellings per annum. The Local Plan Part 1 identifies a housing need for 550 dwellings per annum, which is some 30% higher than the adopted Local Plan requirement. The significance of this increase is apparent in the Council's net additional dwellings as calculated in the Government's latest Housing Delivery Test results. North Norfolk District Council (NNDC) has delivered a total of 486, 442 and 555 dwellings over each of the past three years, only once meeting the target of 550 set in the emerging Local Plan. Clearly, it will be difficult for the Council to consistently meet this uplift unless the Local Plan adequately addresses this issue. The Draft Local Plan Part 1 identifies total growth, including allocations and windfall, to deliver 11,611 dwellings against a requirement of 10,680 dwellings based on the standard methodology. However, the Council states that it 'will wish to carefully consider the deliverability of the final housing target before submitting the Plan for examination'. This is not a reassuring stance to take and should be addressed by providing an adequate 'buffer' of suitable sites for development in the Local Plan, which will mitigate constraints to delivery. The Council is currently not identifying enough land for housing to ensure that a consistent rate of delivery is achieved across the Plan period. Paragraph 11 of the National Planning Policy Framework (NPPF) (2019) requires that LPAs should as a minimum meet their Full Objectively Assessed Housing Need (FOAHN) in their Local Plans in line with a presumption in favour of sustainable development. There should be no question of whether the Council is accepting its housing need as defined by the standard methodology given that this is a key feature of national policy and a requirement on all LPAs. The Council should not be challenging the number of homes it is required to provide but should be focusing on being proactive in identifying a considerable reserve of allocation sites to ensure that it does not</p>	<p>to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				under deliver, especially given its own stated concerns on the rate of delivery. Allowing for a buffer of sites will protect the Council against future uncertainties and risks to the implementation of permissions and allocation sites.	
HOU1	WSP Indigo, Miss Emily Taylor  (1217127)	LP632	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The Council has not published an up-to-date calculation of its five-year land supply position in light of the new standard methodology target. This is a key flaw and omission in its evidence base and there is no justification as to why the latest supply calculation has not been provided alongside the Draft Local Plan Part 1. We have undertaken independent analysis of the Council's Interim Statement published in June 2018. Given that the Council has not supplied an update now that the standard methodology is established in the NPPF (2019), it is pertinent to consider the Council's supply against the updated housing need figure only. When assessed against the standard methodology figure of 538 dwellings per annum, the Council cannot demonstrate a five-year housing land supply when a 5% buffer is applied, as demonstrated in Figure 1. The Council's capability to provide land for housing declines considerably when higher buffers are applied. This puts immense pressure on the Council for sites to come forward through the Local Plan, given the many variables affecting the calculation of supply. It is essential that the Council identifies sufficient deliverable sites and plans for enough housing to maintain a robust rolling five-year housing land supply (inclusive of a 5% buffer) throughout the Local Plan period. In order to do this, NNDC must identify sites in its emerging Local Plan in sustainable locations that can come forward within the first five years of the Plan. Given that the latest completion data for 2018/19 has not been published, the table below may present a more positive position, particularly if completions for the past year have fallen short of the 538 dwelling target. As Figure 1 shows, the Council can only demonstrate 4.87 years' supply if a 5% buffer is applied. However, this assumes that all 2,837 homes included within the supply are deliverable in the next five years. Based on an initial assessment, we</p>	The Five Year Land Supply Statement 2019 has been published and is available on the Council's website, the Council can demonstrate a 5.73 year land supply.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				do not consider that all of these homes will be delivered in the next five years. Therefore, there is a clear shortage which is likely to be more severe than the shortfall identified using the standard methodology indicates. The Council must identify further sites that can come forward within the first five years of the Plan to rectify this position.	
HOU1	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership (1217091 1217088))	LP291	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> White Lodge (Norwich) Limited are the sole owner of 'the Former Nursery site' identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical or desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating</p>	Support Noted.



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue.	
HOU1	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP581	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is important that the target for the provision of new homes in the District over the plan period to 2036 reflects the most recent housing evidence base and the standard methodology set out in the NPPF. Notably the standard methodology identifies a minimum housing need figure and, as such, the upper threshold of that housing need must be stated within the policy, rather than proposing a range of housing provision as currently drafted. The current draft is at risk of being interpreted as a fixed requirement, which is not in accordance with the standard methodology approach, and should be amended.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU1)
<b>Objection</b>	6	Mixed commentary was received around this policy. In relation to the housing target organisations suggested that wording should be altered to demonstrate that any target is set as a minimum and that the council should aim for the higher end of the range. Most commentary accepted that the approach was in line with the standard methodology, however some challenged the lack of any uplift due to future economic growth. The justification being that an uplift was required to address a diminishing workforce brought on by the aging population and the requirement for further in migration. One comment suggesting that alternative approach HOU1b at 12,000 homes was more appropriate to address the identified OAN. Others however acknowledged the council's position brought on through the adoption of the Housing Standard methodology and recognised the challenges that the preferred option would bring with regard to historical delivery rates and supported the 10,500 – 11,00 homes range provided sufficient allocations to meet it were made. As such some commented that the distribution was considered sound and reflected the position of each town in the settlement hierarchy. Connected to the challenges around the numbers, the council was also challenged around the reliance on large sites growth, commenting that the approach provided little to no certainty that the housing target will be delivered and that the council was not identifying enough land for housing to ensure consistent rate of delivery. A solution suggested further consideration to additional deliverable allocations and a wider
<b>Support</b>	8	
<b>General Comments</b>	8	

		<p>distribution / numbers of adequate sites, particularly in higher valued and rural areas and or a buffer of sites should also be considered. In particular, one developer challenged that the amount of growth proposed in North Walsham was unrealistic and more than the market can accommodate and reliance will result in a significant housing deficit over the plan period. Clarity needs to be given around the expected delivery and housing trajectory</p> <p>The high reliance on windfall development over allocation was also raised as an issue.</p> <p>Some commentary raised the issue that of cumulative impacts on the road network should be taken into further account in the setting of settlement targets</p>
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## Local Plan Draft Policy Approaches to Housing Standards

**Summary:** This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse a number of policy approaches concerning matters of sustainable development.

**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:**

**HOU8: Accessible and Adaptable Properties;**  
**HOU9: Minimum Space Standards;**  
**HOU10: Water Efficiency;**  
**HOU11: Sustainable Construction, Energy Efficiency & Carbon Reduction.**

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

### 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 wider principles of sustainable development and the response to climate change with regard to future Plan-making ahead of Regulation 19 consultation and the submission of the Plan.

## **2. Background and Update**

- 2.1 These policies will form part of the wider suite of policies, currently within the housing section of the emerging Local Plan that are an integral response to creating sustainable places and address climate change. The intention that the policies will form part of a wider updated section covering climate change and sustainable development in the final Plan.
- 2.2 The purpose of Policy HOU8: is to ensure that new homes are built to accessible and adaptable standards and as such can 1) be easily and cost effectively adapted as people's needs change throughout their lifetime; 2) increase the overall percentage of appropriate housing across all housing types and tenures; 3) address the historical deficiency in supply.
- 2.3 The purpose of Policy HOU9: is to ensure that new homes offer a reasonable minimum level of residential amenity and quality of life, ensuring that there is sufficient internal space, privacy and storage facilities to ensure long term sustainability and usability of new homes.
- 2.4 The purpose of Policy HOU10: is to ensure that development positively plans to minimise its impact on water resources and contributes to long term water resilience.
- 2.5 The purpose of Policy HOU11: is to promote a proactive strategy to mitigate and adapt to climate change through moving towards a low carbon future in building construction.

## **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 summarised within Appendix 1 to this report and précised below for each draft policy:

### Policy HOU8: Accessible and Adaptable Properties

- 3.2 **Individuals:** Two general comments, one response in support, and one objection were received. Although all generally supportive the objection and one general comment sought higher construction and energy efficient standards as the substantive part of the representation - which are the subject of a different policy.
- 3.3 **Parish & Town Councils:** No comments received
- 3.4 **Statutory Bodies and Organisations:** Three responses in support, two general comments, and two objections were received from developers active in the region and their national representatives.
- 3.5 Some support for the principle of the policy was evident across the development industry, but caution and objections were raised on the reliance of an aging population to justify the approach and application across all development as well as in relation to the requirement to provide evidence of

compliance at application stage. Although the age structure of the District was acknowledged the significant uplift in the housing target in order to address affordability was used to suggest that the approach should not seek higher adaptable standards across all housing outside building regulations and in particular in relation to market housing responding that policy requirement to apply to all homes the M4(2) standard was disproportionate and as such should be reduced to apply to only a proportion of properties. Norfolk Homes specifically thought the approach was *"an unwelcome approach to addressing an existing shortfall"* and *an interference with issues that sit with Building Control*. Extending the approach to all market housing would utilise extra space and unwelcomed costs and require the redesign of many of their existing house types. They suggested that the requirements would lead to fewer smaller market (my *inference*) homes being built and more expensive housing. It was inferred that further consideration of viability and unintended consequences should be looked at in the finalisation of the policy.

- 3.6 Norfolk Homes however in the response confirmed that their affordable homes already comply to M4(2) and previous developments in Cromer the M4(3) requirement which the policy is seeking to apply. Pigeon Development also confirmed that the site they were promoting in the Local Plan at Cromer could accommodate the policy approach. The Duchy of Cornwall supported the approach recognising *the importance of providing accessible and adaptable homes and the requirement to meet the necessary Building Regulations to ensure homes can be lived in by all members of the community*.
- 3.7 Other comments focused on the Council providing more clarity of the requirements and exceptions. Persimmon Homes (Anglia) sought revision to the policy seeking clarity on the need to provide documentation detailing accordance with the standards for all developments at application stage, so as not to be an onerous exercise and circumstances around exceptions. Norfolk Homes objected to this requirement stating that it was entirely at odds with the Government's intention of reducing the burden on house builders and ensuring the planning system is quicker, efficient and more responsive in delivering houses and that the *policy is an example of planning seeking to interfere with issues squarely in the remit of the Building Regulations, and for which a planning policy is entirely superfluous*

#### Policy HOU9: Minimum Space Standards

- 3.8 **Individuals:** Where comments were received they focused on support in relation to the benefits of providing healthy spaces to improve wellbeing. One sought an exception to new build tourist accommodation so that new development could mirror historical delivery.
- 3.9 **Parish & Town Councils:** No comments received.
- 3.10 **Statutory Bodies & Other Organisations:** Feedback from development industry offered mixed views to the proposed approach. Although high quality design, functional and spacious homes were supported along with the Council's aspiration some suggested there was no evidence to suggest that adoption of the standards will improve the quality of housing or living conditions and the unintended consequences of people purchasing larger homes but with less bedrooms leading to overcrowding. The House Builders Federation, HBF, point to high levels of satisfaction in internal design of new homes as justification to

their general comment as well as raising issues around affordability and that the Council's review of size does not reflect need. They suggest that more flexibility is required in the application of the policy around deliverability and viability. Others objected to the requirement to submit a separate document setting out how proposals would comply, suggesting that the requirement was too prescriptive and placed a burden on applicants. Consideration should be given to including this requirement in the Design and Access statement as a solution. Support was also given for the ambition and some advised that the approach was reasonable and support the shift towards liveable homes.

Policy HOU10: Water Efficiency;

- 3.11 **Individuals:** Limited comments received on this policy. No substantial issues raised.
- 3.12 **Parish & Town Councils:** Support for prescriptive water efficiency targets
- 3.13 **Statutory Bodies & Other Organisations:** Anglian Water fully support and endorse the optional water efficiency standard being applied within the North Norfolk Local Plan area. Recognising the Area is one of water stress classification by The Environment Agency the response advised stage was that policy should encourage development to go to improve and go beyond this standard which has wider benefits.

Policy HOU11: Sustainable Construction, Energy Efficiency & Carbon Reduction;

- 3.14 **Individuals:** Most comments whether making a general observation, in support of the approach or objected generally supported this policy, with most concluding that the policy does not go far enough in its prescriptive nature of ambition in relation to the Council's subsequent declaration of climate change.
- 3.15 **Parish & Town Councils:** Where Town councils responded (3) there was support for more prescription in setting targets around energy efficiency and carbon reduction. One TC suggested that the policy should give careful attention to roof orientation and give priority to grey water recycling over other measures such as water storage and green roofs
- 3.16 **Statutory Bodies & Other Organisations** All respondents from statutory bodies and the development industry were supportive of the policy and the designing out of emissions followed by the use of low carbon technologies. Three of the major house builders and site promoters that are active in the region responded. One, pointed out that the approach would not assist the Council in achieving its wider ambition to improve the existing housing stock, while others, (Norfolk Homes and Persimmon) were concerned around the impacts on development viability. A number of issues were put forward for further consideration, these included: The removal of the requirement to include a separate energy statement (on all development) - instead allow developers to incorporate supportive information in the Design and Access Statement. Further consideration around the impacts on viability and density due to the impacts on site layout and potential restrictions on development materials. One organisation suggested that the policy should be more prescriptive in its use of renewable technology and a demonstration how development will achieve carbon neutrality.

## 4. National Policy

4.1 The NPPF through footnote 46 para 127 states that:

*Planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.*

These standards may only be introduced locally via the inclusion of policies in adopted Local Plans and any such policies may only be introduced if:

- There is evidence to support the need for them; and
- The additional costs associated with the enhanced standards have been tested in terms of their potential impacts on the viability of development.

4.2 The national [Planning Practice Guidance](#), PPG clarifies that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and adaptability and water, and an optional nationally described space standard subject to appropriate evidence in order to justify the setting of appropriate policies in their Local Plans.

4.3 Since the Regulation 18 Consultation the government has gone one step further to evoking the minimum space standards nationally. In September the government introduced legislation to ensure all new homes provided through permitted development rights and those that require prior approval will comply as a minimum to the nationally described space standards (as published 2015). This will take effect from the 6.04.2021. Part of its justification was the recognition that the move would prevent a small number of developers from providing homes below an acceptable standard. The move was widely seen as step in the right direction by professional bodies.

4.4 Planning Practice guidance requires LPA to provide justification for the approach taking into account:

- Need - evidence should be provided on the size and type of dwellings currently being built in the area
- Viability: the impact of adopting the space standard should be considered as part of a plan's viability assessment and include the effect on the impacts of affordable housing
- Timing: factor in a reasonable transition period.

4.5 The NPPF, Para 149, states that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change, including taking account of **water supply**. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. The Planning Practice Guidance states that, where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.<sup>1</sup> The guidance goes on to advise that any

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<sup>1</sup> Paragraph: 014 Reference ID: 56-014-20150327, Revision date: 27 03 2015

clear need should be established based on consultation with the local water companies and primary sources of evidence such as Water Stress classifications produced by the Environment Agency and River Basin Management Plans. Any policy requirement is subject to viability assessment.

- 4.6 In relation to **construction, energy efficiency and low carbon economy** the NPPF signals the governments that the planning system should be used to move to a low carbon economy. Moving to a low carbon economy is seen as fundamental part of achieving sustainable development and in doing so the NPPF is specific in that the objectives of sustainable development should be delivered through the preparation and implementation of Plans<sup>2</sup>. Section 14 of the NPPF, 2019 empowers LPA's to introduce a positive strategy and policies that reduce carbon emissions from new homes and help increase the use and supply of renewable and low carbon energy.

*The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure Para 148*

- 47 The Planning for Climate change section goes on to state:

*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures<sup>48</sup>. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure. Para 149.*

- 4.8 *New development should be planned for in ways that:*

*a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and*

*b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Para 150.*

- 4.9 Paragraph 131, also charges planners with placing great weight on designs which promote high levels of sustainability (as appropriate to local context). Whilst para 129 specifically promotes the use of assessment frameworks and design review tools.

- 4.10 The NPPF along with the section 182 of the Planning Act 2008, the Planning and Energy Act 2008 puts a positive emphases and a legal duty on local

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<sup>2</sup> NPPF 2019 Section 2 Achieving sustainable development para 8 and 9.



authorities to include policies on climate change mitigation and adaption in Development Plan Documents. The Climate Change Act passed in 2008 committed the UK to reducing greenhouse gas emissions by at least 80% by 2050 when compared to 1990 levels.

- 4.11 The Governments' Clean Growth Strategy 2017 specifically highlights the role of Local Planning Authorities through local leadership;

*Moving to a productive low carbon economy cannot be achieved by central government alone; it is a shared responsibility across the country. Local areas are best placed to drive emission reductions through their unique position of managing policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport, and housing. Page 118*

- 4.12 Since then there have been numerous documents and reports published across Government including significant and influential publications by the Committee on Climate, set up as an independent, statutory body under the Climate change Act 2008 including: UK Housing Fit for the Future? Feb 19, Net Zero - the UKs Contribution to Stopping Global Warming and the Net Zero Technical Report, May 2019<sup>3</sup>. The UK emissions are not limited to just housing, transport remains the greatest sector contributor to CO2 emissions, and the decarbonisation of the national Grid is central strand to the Governments medium to longer term strategy. The approaches are however interrelated, with the Local Plan policies playing their part across all sectors not least directing growth to settlements with services, reducing the reliance and necessity for frequent trip seeking greater green infrastructure and connectivity and reducing the overall demand for travel. The governments Road to Zero, July 2018, RTZ strategy sets out the ambition for at least 50%, and as many as 70% of new car sales to be ULEVs by 2030, alongside up to 40% of new vans, and aligned to that is the need to ensure the charging infrastructure, both in new homes and business and public parking is developed through planning policy. The Automated and Electric Vehicles Act 2018 gives powers to ensure charge points are compatible with all vehicles and charging payments are standardised, and the Clean Air Act 2019 sets out a the approach for bringing stronger and more coherent legislation against air pollution.

- 4.13 [In 2019 The Government introduced a legally binding](#) <sup>4</sup> target to reduce greenhouse gas emissions to net zero by 2050 – making the UK the first major economy in the world to legislate a zero net emissions target. Net zero means any emissions would be balanced by schemes to offset an equivalent amount of greenhouse gases from the atmosphere, such as planting trees or using technology like carbon capture and storage.

## 5. **Conclusions for Policy HOU8: Accessible and Adaptable Properties.**

- 5.1 From the outset it should be noted that Local Plan policy can only focus on new developments, retrofitting the historic stock remains an ongoing but separate issue that falls under the remit of the separate housing strategy outside the Local Plan. The requirement for new dwellings to comply does though start to reduce that future burden both on authorities and statutory providers and will seek to enhance lifestyle choices and wellbeing from the outset for local

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<sup>3</sup> <https://www.theccc.org.uk/>

<sup>4</sup> <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

residents and help to allow more people to stay in their own homes longer complementing wider district, regional and national policy approaches around healthcare, sustainable design, communities and place shaping.

- 5.2 Evidence to justify the policy approach was set out in a previous report and summarised through a presentation given to this PPBHP in August 2018. The previous report can be found in the ModGov Library for August 2018 [here](#) and or by the links referenced below<sup>5</sup>. **Background paper no 7**, published to support the policy approach at Regulation 18 (<https://www.north-norfolk.gov.uk/media/5026/7-construction-standards.pdf>) provides detailed and comprehensive evidence and sets out the required justification and makes the compelling case for this policy in North Norfolk, especially when combined with Policy HOU9 Minimum Space standards.
- 5.3 The viability of requiring enhanced accessibility or adaptability standards over and above building regulations has been tested in the Local Plan Viability study 2018. The appraisals test the impact of requiring 100% of homes to be built to Category 2 standard for accessibility and adaptability. For the majority of housing development this is estimated to add £10sqm over National Housing Standards equivalent build cost allowance for houses and £15 sqm for apartments. This is over and above the Governments assessment of *cost of £9.31 per sqm for a 2 story 3 bed dwelling and £7.32 per sq m for a 2 bed dwelling* as derived from the accompanying cost impact study. More detail is contained in Background paper no 7 Housing Constructions Standards para 7.6, and the Council's Plan Wide Viability study. The study concludes that there is sufficient headroom across all areas and development typologies for new development to meet optional technical standards. Affordable housing is confirmed to be able to meet the costs in the regulation 18 feedback from developers and the government's own cost impact study shows that significant proportions of additional costs can be recovered through sales value increases especially when there are perceived extra values in relation to space<sup>6</sup>.
- 5.4 Addressing the remaining feedback, the regulation 18 version of the Plan included clear text around exceptions to the approach in the Plan text and the policy. These could be due to specific challenges due to topography, flood risk and /or the relationship to design. Where such material considerations exist it will be up to the promoters to demonstrate the M4(2) or M4(3) requirements are not feasible to be delivered and exemption will be made on a case for case basis based on clear evidence submitted as part of the planning application.
- 5.5 The amended approach is set out in Appendix 2.
6. **Conclusions for Policy HOU9: Minimum Space Standards**
- 6.1 It has long been established that the case for space and improving the quality of new homes needs to be a joint venture for house builder, architects, planners and policy makers and part of this is having the appropriate suit of policies in the Development Plan. Add in the higher than average proportion of those in employment working from home in North Norfolk (12.3% compared to regional average of 8.6%<sup>7</sup>) and the recent events around Covid19 and lock down and it is also being argued that the move for suitable space, not least to

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<sup>5</sup> The links are: <https://modgov.north-norfolk.gov.uk/documents/s2281/Agenda%20-%202020%20August%202018.pdf>

<sup>6</sup> Note - No addition uplift is applied to the council's Reg 18 viability study

<sup>7</sup> Census 2011

provide for home working but for quality family space both collectively and private has become even more apparent.

- 6.2 Background paper no 7, published to support the policy approach at Regulation 18 (<https://www.north-norfolk.gov.uk/media/5026/7-construction-standards.pdf>) sets out the required justification and makes the compelling case for this policy in North Norfolk, especially when combined with Policy HOU8 Accessible and Adaptable Housing, where many of the standards evoked complements the delivery of the national prescribed space standards. Recent Covid 19 experience adds weight to the need for future housing to provide liveable and workable space within homes for all the family.
- 6.3 The background paper analysis of new homes being built on housing estates across North Norfolk reveals that approximately 58% of dwellings being built do not meet one or more of the minimum national space standards. For Flats this falls to 50%. Sixty-nine percent of the development in North Norfolk meets the space standards for gross Internal space, dropping to 61% for the 1-2 & 3 bed properties i.e 39% do not meet the minimum space standard. In the larger 4+ bedroom dwellings the figure is much higher at 95.3% meeting the standard. The internal configuration of some dwellings with smaller bedrooms, is leading to developments with dwellings that are below the specific requirements of the national standard.
- 6.4 The provision of sufficient space in dwellings remains an important element of good design and influences the take up and delivery of new housing. A lack of space can compromise basic lifestyles needs, such as household space to play, relax, privacy, private work space, and storage of possessions. It can have significant life effects on health, family relationships, educational attainment social cohesion and individual wellbeing. The Governments own housing standards review concluded that the UK builds some of the smallest homes in Europe<sup>8</sup> and there has been a downward trend in house sizes across the UK. It is widely reported that the key desirable factors when considering a new home include the provision of adequate space (living and storage) inside and outside the home, along with the proximity to services.
- 6.5 Given the population profile, the inescapable fact that the population of North Norfolk is aging at one of the fastest rates in the country, nature of existing housing stock and low levels of new development that currently meet the standards, specifically in relation to one, two and three bedroom properties where there is the greatest need, there is clear justification to require all new properties to at least meet, and or exceed, the prescribed minimum national space standards.
- 6.6 The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. The approach is included in the Plans viability assessment. The time line of local plan production is considered to be appropriate for any transition period for the introduction of such a policy requirement. By invoking these changes through the Local Plan it is considered that the national space standards will help to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of

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<sup>8</sup> Evans, A and Hartwich, O.M.(2005) Unaffordable Housing: Fables and Myths, Policy Exchange: London as detailed in Housing Standard review Final Impact Assessment footnote 19

responding to occupants needs throughout their lifetime and changing circumstances and is aligned to the wider Council's ambitions.

- 6.7 It is important that developers are transparent at application stage and provide the necessary details to enable the LPA to determine if their proposals are in line with the Development Plan and it is considered **entirely reasonable and proportionate** that developers should specifically set out how their proposal meets the policy standards as part of any submission. The suggested inclusion of this information as part of the Design and Access Statement is appropriate and it is suggested that the text to the policy is altered to reflect this indicating that such information can be part of the Statement or a standalone document.
- 6.8 Although some developers may be happy with the take up rate of their products, if the Council is to meet and exceed its housing targets there needs to be a step change in delivery. A significant part of that is built around people's perceptions of housing. As detailed in the background paper, Research undertaken for the RIBA's Homewise report 2015<sup>9</sup>, revealed that more than half of the new homes being built today are not big enough to meet the needs of the people who buy them. Outside of London the average new 3 bedroom home is missing 4m<sup>2</sup> - This might not sound much but it is the space of an additional bathroom or it could be the space to set up as a home office out of the kitchen or living room. The earlier Case for Space report commissioned a poll to test perceptions and preferences around new built homes and it revealed that people believe that newly built homes fail to provide two of the top three things they are looking for when moving home: adequate space inside and outside the home.
- 60% of people who would not buy a new home said that the small size of the rooms was the most important reasons for them.
  - The top three things people look for when moving home are outside space (49%), the size of the rooms (42%), and proximity to local services (42%)
  - Overall the number of rooms was of less importance but people wanted rooms that were big enough with 42% listing size of rooms at the top of their preference list. This issue has also been demonstrated through other surveys where the perception of new builds is that they do not have enough room for the basic needs of the occupiers.

The emerging Local Plan seeks to address all three of these considerations.

- 6.9 In addition the provision of sufficient space in dwellings is an important element of good design and research by the Royal Institute of British Architects, RIBA , has demonstrated that the space in homes can affect the educational outcomes of children, have avoidable public health costs, affects individual wellbeing, interpersonal interactions and relationships<sup>10</sup> A lack of space can compromise basic lifestyles needs, such as household space to play, relax, privacy, private work space, store possessions and can have significant life effects on health, family relationships, education attainment and social

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<sup>9</sup> <https://www.architecture.com/knowledge-and-resources/resources-landing-page/space-standards-for-homes#available-resources>

<sup>10</sup> Space Standards for Homes 2017 incl Case for Space RIBA <https://www.architecture.com/knowledge-and-resources/resources-landing-page/space-standards-for-homes>

cohesion. The size and layout of new dwellings is therefore an important influence on the health and wellbeing and With the North Norfolk housing market being reliant on and driven by the sale of new homes it is important to ensure that new builds match the needs of future occupiers, most of whom are in the higher age brackets

- 6.10 As pointed out in the developer's feedback such a policy could lead to issues around site viability and may lead to reduced access for first time buyers, based on the argument that small homes can also contribute to meeting housing need. Site viability however is influenced by the price paid for land which in turn is influenced by the local policy position however **the onus is on developers to ensure that the price for land does not negatively affect the delivery of local plan objectives**, with Government advice now clearly stating that the price paid for land is not a relevant justification for failing to accord with relevant policies in a Plan. The wider objective of the Plan is also to deliver more two and three bedroomed properties and these should be functional and liveable homes; being spacious and well-proportioned will be key to longer term sustainability and community wellbeing.
- 6.11 Given the population profile, nature of existing housing stock and low levels of new development that currently meet the standards, specifically in relation to one, two and three bedroom properties where there is the greatest need, coupled with the high need for two and three bedroom properties, there is clear justification to require all new properties to at least meet, or exceed, the prescribed minimum national space standards.
- 6.12 Viability matters are also covered in Background paper and the Local Plan viability study which takes full account of the no of bed spaces and residential floor areas in the national space standards. The study demonstrates that a positive margin exists across all typologies in the District in line with the Council's emerging Local Plan strategy and it is concluded that the introduction of the standards would not have an impact on the viability of proposed developments.
- 6.13 In response to the feedback it is considered that there is scope to undertake some minor changes and clarifications to both the policy and the local plan pre-ambled text in order to strengthen the policy wording so that there is a clear purpose for consideration and to ensure any ambiguity is removed.
- 6.14 The supporting text is altered removing contextual information designed to inform at regulation 18 stage and strengthened in areas to aid interpretation and application.
- 6.15 The policy is amended for reasons of clarity as set out in appendix 2 to this report.

## 7. **Conclusions for Policy HOU10: Water Efficiency**

- 7.1 Overall no issues were raised. Support for this approach was received from Anglian water who provided for consideration some amended wording which would encourage developers to go beyond the national standard which has wider benefits to the District.
- 7.2 The evidence base supporting this policy is set out in section 8 [Background Paper no 7](#). The Environment Agency identify the whole region at the highest

level of serious stress and the introduction of the optional demand management is supported in the Anglian River Basin District River Basin Management Plan and the Revised Draft Water Resource Management Plan 2019. The Norfolk Authorities in conjunction with Natural England, Environment Agency and Anglian Water through the Norfolk Strategic Framework and Duty to co-operate process recognises that Local Plans should contribute to long term water resilience through a joint agreement.

7.3 The policy is amended to reflect Anglian Water advice which would encourage developers to go beyond the national standard. Clarify is added so that it is clear the principle of water efficiency applies to all development and not just residential. In line with local ambition and the drive for good water management the policy is amended to include non-residential properties.

7.4 The costs associated with BREEAM certification in relation to water efficiency are modest with payback estimated at less than two years for water and are between 0.1% and 0.2% capital costs depending on the type of development.

7.5 The updated draft policy text is set out in appendix 2 though it may be subsumed into broader sustainability policies in the final version.

## 8. **Conclusions for Policy HOU11: Sustainable Construction, Energy Efficiency & Carbon Reduction.**

8.1 Homes both new and existing account for 20% of emissions and in order to ensure the net zero target is progressively reached the government is aiming to increase the energy efficiency requirements of all new homes through incremental changes in the regulatory requirements of Building Regulation. The government consulted on the first part of this approach in October 2019 and is committed to consult on further technical and cost detail in 2023. The Future Homes Standards and legislation are set to be introduced in 2025 and will be implemented through Building Regulation, as such will sit outside Planning. According to the [MHCLG statement](#)<sup>11</sup> 19.1.21 the standard *will set out plans to radically improve the energy performance of new homes with all homes to be **highly energy efficient, with low carbon heating and be zero carbon ready by 2025.*** “

8.2 In the response to the Future Homes Standard consultation published 19.1.21 the Government confirmed that *work on a full technical specification for the Future Homes Standard has been accelerated and they will consult on the detail in 2023. They also stressed that they also intend to introduce the necessary legislation in 2024, ahead of implementation in 2025 and that they intend to introduce an interim update to building regulation that will result in a 31% reduction in CO2 from new dwellings when compared with current standards<sup>11</sup> sometime in 2021.*

8.3 The ambition of the Government is that the legislation and standards will

- set the performance standard of the Future Homes Standard at a level which means that new homes will not be built with fossil fuel heating, such as a natural gas boiler; and
- Homes will be future-proofed with low carbon heating and high levels of energy efficiency. No further energy efficiency retrofit work will be necessary to enable them to become zero-carbon (ready) as the approach is also linked to the decarbonisation of the electricity grid.

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<sup>11</sup> Target emissions Rate of the 2013 Edition of the 2010 Building Regulations Part L amended 2016

- 8.4 In order to achieve this and help prepare supply chains and the skills that are necessary the Government has indicated in its response to the Future Homes consultation that its approach is incremental. A progressive reduction in carbon emissions is envisaged moving beyond the previous 19% reduction, as set in the emerging Local Plans Regulation 18 Policy HOU11, to 31% and then 75% reduction in carbon from current standards. In order to achieve such a step change the government is encouraging early investment and upskilling across the development industry in order to transition. In doing this a draft specification of the Future Homes Standard has been published<sup>12</sup>. While it must be noted that this is not final and subject to further technical work and consultation it is shared a) so that it shows the comparisons between new standards and the previous standards and b) so that developers can begin to transition, spread the costs of redesign and engage across the industry.
- 8.5 The Government's intention to introduce these significant step changes through legislation and short term incremental changes to part L of the Building Regulation and through planning reform could **negate the requirement for a localised planning policy in the emerging Local Plan** as it would be superseded by the proposed changes in Building Regulations and or changes to the planning system as outlined in the recent White Paper. However accepting the now legally binding commitment the Government has recently made, one may remain sceptical, especially given the past record around previous commitments on delivering carbon neutral homes, the potential for government resources to continue to be diverted due to the Covid 19 response remains and the backlash to many of the controversial proposals around Planning Reform.
- 8.6 The ability for any Local Planning Authority, LPA to set interim standards through Local Plan policies which require developers to comply to energy efficiency standards that exceed the current energy requirements of Building Regulations has helpfully been confirmed. In the Government's response to the Future Homes Standard consultation published January 2021, it was confirmed that the government believe local councils have a role in helping to meet the net zero target and tackle climate change and it was clarified that the Government will not bring in the previous amendments to the Planning and Energy Act 2008, which restricted Local Planning Authorities ability to set local standards that exceeded the energy efficiency standards set out in level 4 Code for Sustainable homes (19% reduction). This means that local authorities currently retain the powers to set local energy efficiency standards for new homes.
- 8.7 However the document also states that *"as we move to ever higher levels of energy efficiency standards for new homes with [updated building regulations] and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal"*
- 8.8 In addition members will recall that the recent Planning White Paper proposes many significant reforms to the planning system and it needs to be born in mind that it is the Government's intention that the new planning reforms will clarify

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<sup>12</sup> The Future Homes Standard 2019 Summary of responses and Government response January 2021 Table 2 para 2.31

the longer term role of planning authorities in determining local energy efficient standards.

- 8.9 Members will recall that the in a Written Ministerial Statement (WMS) in March 2015, the Government stated that '*local planning authorities...should not set...any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.*' The exception was the optional M4(2), M4(3) and the optional prescribed minimum space standards and energy performance, where the WMS sought to amend the Planning and Energy Act 2008, clarifying that LPAs would continue to be able to require energy performance standards higher than Building Regulations but only up to the equivalent of Code for Sustainable Homes Level 4 '*until commencement of amendments to the Planning and Energy Act 2008*'. However these commencements have not been implemented and there has been much debate and confusion on this issue.
- 8.10 Historically the Government intended to introduce higher energy performance targets nationally in 2016 at a level equivalent to the then(outgoing) Code for Sustainable Homes Level 4, but this was scraped along with the then Zero Carbon Policy after the general election in 2015. Despite the more recent and new government commitments and drive to zero emissions by 2050 the powers of the 2008 Act remain and the ability and timing of the Government to implement the commencements has always brought a level of uncertainty to the process, as they potentially remove the ability of the Council to require energy performance standards for new homes that are higher than Building Regulations and above the 19% reduction in carbon associated with the revoked level 4 of the Code for Sustainable Homes. Such a requirement was included in the regulation 18 consultation version of the emerging Local Plan with the policy approach reflecting the maximum permissible level in order to not introduce legal and soundness risks to the Local Plan. Further information on this, the approach at Regulation 18 and the legislative background, energy performance and carbon reduction is contained in chapter 13 of **Background Paper No 7 - Housing Construction Standards** published to support the Regulation 18 consultation and in the more recent Governments response to the Future Homes Standard.
- 8.11 The renewed clarification that the government expects Local Plans to help create a greener built environment and the move towards higher carbon reduction standards through building regulation in the near future are therefore welcomed.
- 8.12 In creating that step change required in construction technics and energy efficiency of dwellings ahead of the governments legislation and in line with the wider Council ambition and the responses' at regulation 18 stage **it is considered appropriate to continue to set a localised target, aid development through transition and that the approach should be more progressive and set a higher target.** One that aligns with the Governments direction of travel, and signals that developers in North Norfolk need to invest in supply chains, upskill, update designs and incorporate mitigation and adaptation measures and technology to support the delivery of the lowest levels of carbon emissions needed to deliver homes after its 2022 adoption and ahead of the Governments proposed time line in order to start to reduce the future proportion of emissions from the building sector and **decarbonise new dwelling across North Norfolk from the start of the Local Plan.**



- 8.13 In including such an approach, **it must be accepted that such a policy could be superseded in the short to medium term through the proposed national legislation.** Never the less it shows great intent in light of consultation feedback, the Government's response to the Future Homes Standard and the clear direction of travel on decarbonisation of the whole economy while recognising the Council's ambition in the declaration of its own Climate Change Emergency<sup>13</sup> to amend the regulation 18 policy through the introduction of a higher local standards ahead of the Building Regulation changes. In doing so members need to be clear in your own minds the two separate roles of the Local Planning Authority and that of any corporate ambitions the Council may have for its own developments. The standards set in such a policy would apply to all development as a minimum and is informed by evidence. It does not inhibit any developer including development brought forward by the Council to go further in line with its own ambitions or environmental charter, as long as it is prepared to invest and is in conformity with the Local Plan as a whole.
- 8.14 **The ambition of the approach is that energy efficient, low carbon homes will become the norm in new build developments in North Norfolk. By making our new homes and other buildings more energy efficient and embracing smart and low carbon technologies, we can improve the energy efficiency of peoples' homes, potentially boost economic growth, help in the reducing carbon emissions and be more cost effective in long term management and day to day running costs in the housing sector.**
- 8.15 As detailed in the Background paper, there is not a national technical standard for carbon reduction in the same way that there are technical standards for space, water and access. The NPPF and Planning system as a whole directs us to meet the challenges of climate change, part of which is to support the transition to a low carbon future.

*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures<sup>14</sup>. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure. Para 149 of the NPPF, 2019.*

- 8.16 **As outlined in the national policy section of this report above it is not only technology that assists but energy efficient design measures should be the starting point.** These minimise internal heat generation, including building orientation, scheme layout and appropriate shading, insulation, air tightness and green roofs and walls, internal heat control through exposed thermal massing, passive ventilation, material choice followed by mechanical ventilation and then active heating and cooling systems based on the lowest carbon options, such as heat pumps, which the government expect will become the primary heating technology for new homes.
- 8.17 The policy approach is supported at consultation stage, is one that accords with the Councils ambition of stepping up to address climate change and one of designing out emissions, followed by the use of low carbon technologies and is

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<sup>13</sup> <https://www.north-norfolk.gov.uk/news/2019/august/north-norfolk-district-council-hosts-environment-assembly/>

<sup>14</sup> In line with the objectives and provisions of the Climate Change Act 2008.

aligned to the direction of travel of national policy approach through the use of a progressive fabric first approach alongside the use of low carbon heating systems. The approach is encouraging developers to act now and start the transition.

- 8.18 In considering the responses at regulation 18 for those that wanted greater prescription. It is not for policy to pre determine how developers will achieve this through prescriptive measures. Each development and development site is different, technology is advancing at a fast pace, supply and costs vary and **how this will be achieved is depended on type and scale and design of a proposal.** The approach allows **flexibility** and discretion to the developers in line with the overall ambition and is not intended to be prescriptive in measures. Developers are free to vary specifications to meet the policy target through fabric improvements, design and or technology provided the overall carbon reduction is achieved or bettered.
- 8.19 The policy is intended to be bring in progressive change but in advance of the governments intended building regulation review and legislation through the Future Homes Standards.
- 8.20 In doing so members and decision makers at committee will need to be mindful that in cases there may be reluctance to change in the short term, potential supply and technological issues or insufficient skilled labour. **Where this is the case it is anticipated that rather than design measures, passive and mechanical ventilation and the low cost heating solutions envisaged that the immediate impact of such a policy will not be fabric improvements but that there will be a greater reliance on solar panels to achieve the policy target.** Although it is stepping in the right direction in the short term it may bring forward viability challenges which will have to be balanced. In doing so it is worth noting that it is the government intention that that the price paid for land is not a relevant justification for failing to accord with relevant policies in a Plan. Site viability however is influenced by the price payed for land which in turn is influenced by the local policy position however the onus is on developers to ensure that the price for land does not negatively affect the delivery of local plan objectives.
- 8.21 The costings for 19% reduction in carbon were included in the 2018 Local Plan wide viability assessment, and the assessment will need to be updated for the final iteration however no uplift was applied to future sales values at the time and a viability cushion shows that there remains some margins to absorb additional costs. Further details of this and costings can be seen in Background paper no 7 and the viability assessment. The governments Future Homes Standard approach and the Local Plan policy is based on the most cost effective ways of reducing CO2 emissions from new homes and is a balance between progression and the wider aims of the Council in its obligation to meet the wider housing need and infrastructure requirements. It is widely predicted that with the government specifying the higher performance controls and promoting low carbon technologies there will be future saving through cost effective and supply measure. The district is primarily a rural district and the approach may raise challenges for remote dwellings, where modern technologies / design measures may conflict with other policy intentions however the Local Plan directs growth to the most sustainable and appropriate locations and inappropriate development should be refused, where there is conflict the case should be made and material considerations taken into account by the decision maker.

- 8.22 The costs benefits on consumer on energy bills, reduction in fuel poverty, and lower future demand for fuels and the wider positive impacts resources and climate change are also a consideration. The government predict significant cost saving to the user due to reduced demand through good levels of energy efficiency. Under the interim Part L 2021 standard expected i.e the 31% carbon reduction, *they anticipate that householders will pay around £168 per year on their regulated fuel costs in a home with a gas boiler and a solar panel or around £369 per year on their energy bills in a home with a heat pump (the energy costs associated with a home with a heat pump are subject to the consultation question in The Future Buildings Standard consultation on the level of the Fabric Energy Efficiency Standard).*<sup>15</sup>
- 8.23 In response to regulation 18 feedback, the policy requirement that all proposals should be accompanied by a separate compliance statement covering energy efficiency and carbon reduction is not seen as onerous, indeed some applications do so already, though it is accepted that this could be part of the Design and Access Statement ( where required), or a separate energy statement. Text is amended so that it is clear that a Compliance Statement is required and what it should include.
- 8.24 In line with national and local drive for progressive energy efficiency the policy ambition is to drive sustainability standards across all types of development and as such, in line the promotion of assessment framework and design review tools promoted through para 129 of the NPPF the policy approach is to utilise BREEAM very good standard for non-residential development The cost uplift of achieving New Construction 2018<sup>16</sup> for 'Very Good' scenarios, the BREEAM related capital cost uplifts over the baseline building's overall construction costs are less than 0.25%.

## Conclusions

- 8.25 The policy and reasoned justification text is amended, updating the basis for a local approach and to clearly state that the target carbon reduction is a minimum but part of the progressive direction of travel signalled by the Government and the drive for development to be carbon ready in the short term. The target reduction itself is amended in line with the latest evidence and emerging government expectations from the Future Homes Consultation response and sets an interim position in advance of building regulation changes of 31% carbon reduction. Developers are encouraged to go further when possible. For non-residential development the minimum standard is raised from "good" to "very good" in in order to align with the progressive expectations of performance. By evoking the requirement for appropriate non-residential development over 500sq meters to comply to the BREEAM" very good" energy efficiency standard or equivalent successor the policy approach is seen as setting a progressive target that is reasonable, viable and deliverable and accords with the direction of national travel and Council ambition. A threshold is used to avoid additional burdens / costs on smaller scale employers and community initiatives. The approach its self does not

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<sup>15</sup>Future Homes Standard, summary of responses and Government response Jan2021 Para 3.64

<sup>16</sup> Source: BREEAM Delivering Sustainable Buildings: Savings and Payback Office Case Study for BREEAM UK New Construction 2018. [https://files.bregroup.com/breeam/briefingpapers/Delivering-Sustainable-Buildings-Savings-and-Payback-Office-Case-Study-BREEAM-NC-2018\\_BREEAM BRE\\_115359\\_BriefingPaper.pdf](https://files.bregroup.com/breeam/briefingpapers/Delivering-Sustainable-Buildings-Savings-and-Payback-Office-Case-Study-BREEAM-NC-2018_BREEAM BRE_115359_BriefingPaper.pdf)

require a reduction in carbon but does evoke the requirement for low carbon design.

8.26 Clarity is added around the requirement for a compliance statement with the aim of ensuring development in North Norfolk **starts the transition to carbon zero ready, is energy efficient, and that low carbon homes will become the norm in new build developments from the adoption of the Local Plan.**

8.27 The amended approach is set out in Appendix 2.

## 9 Recommendations

9.1 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:

**HOU8: Accessible and Adaptable Properties;**

**HOU9: Minimum Space Standards;**

**HOU10: Water Efficiency;**

**HOU11: Sustainable Construction, Energy Efficiency & Carbon Reduction.**

## 10. Legal Implications and Risks

10.1 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.

10.2 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.

## 11. Financial Implications and Risks

11.1 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 HOU8-HOU11

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 HOU8 - Accessible & Adaptable Homes (Regulation 18 Responses)

#### Individuals

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

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

## Parish & Town Councils

No comments received.

## Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU8	Gladman Developments, Mr Craig Barnes (1217131)	LP280	Object	Gladman acknowledge the general need to ensure that homes are provided to meet the needs of a diverse population. As such, Gladman support the Council's aim to ensure that new homes are built to standards which reflects the needs of the population. That said, PPG is clear that optional standards which are to be applied in excess of building regulations need to be sufficiently justified , and as a result evidence is required to justify the level of provision which is proposed. Whilst it is accepted that the population of North Norfolk is to age significantly over the plan period, Gladman question whether this provides sufficient justification to require 100% of new homes to be developed to M4 (2) standards. This is especially the case given that a large part of the housing requirement reflects an uplift made in response to affordability issues. This uplift is required largely to provide opportunity for younger households to form and access the housing market. As such whilst natural growth in population is driven by an ageing population, market transactions will be more mixed. Furthermore, the mix of dwellings provided over the plan period will include types of dwellings which by their character and location would not be suitable for elderly people. It would be inappropriate to require larger dwellings to be provided to accessible homes standards given the under occupation of dwellings this would promote. A 100% requirement is therefore not justified.	Noted Consider comments in the finalisation of the policy. The approach is supported by detailed evidence contained in background paper no 7: Housing Construction Standards published with the consultation documents.
HOU8	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP756	General Comments	National guidance advises that local plan policies for Category 3 homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (NPPG Ref ID: 56-009). It would therefore be contrary to national policy to seek a proportion of category 3 dwellings in housing other than affordable housing to which the local authority has nomination rights. In addition national guidance indicates that optional requirements in part M should not be applied to non-lift serviced multi-storey housing developments. The policy should acknowledge that the policy requirements will not apply to such developments above ground floor. A modification is therefore required to the wording of this policy to make it sound	Disagree - national policy may state that optional requirement M4(3) can only be applied where the local authority is responsible for nominating a person to live in that dwelling. The evidence estimates a wheelchair accessibility need (current and future) of approx. 10% of households in order to meet unmet and future need in an affordable property across the District. This could arguably be seen as a lower end of potential need range given the projected large

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					increase in over 65 age cohorts and in particular the over 85s . A policy requiring 5% M4(3) dwellings on schemes of 20 allows for the provision of one full unit in most allocations . Such a provision would fall into the higher affordable housing percentage required in policy HOU2.
HOU8	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP535	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Persimmon Homes (Anglia) suggest that Policy HOU8 be revised to provide greater clarity as to whether it requires all residential proposals to include a separate document setting out how a proposal would accord with relevant standards as detailed in Building Regulations, or, whether such a document would only be required when exemptions are being sought. If the separate document is required on all residential proposals (regardless of whether exemptions are being sought), Persimmon Homes (Anglia) would object to this policy on the grounds of it placing excessively onerous requirements upon developers at the application stage. The policy requires compliance with the Building Regulation standards and this mechanism for delivery is considered sufficient without the need to submit additional information at the application stage.	Noted: consider clarification in future iteration of the Plan, regarding whether the separate document is required on all residential proposals (regardless of whether exemptions are being sought). It is considered
HOU8	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP624	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Whilst we support the aspiration of providing homes that will meet the needs of the older population and confirm that this requirement can be accommodated within site C10/1, imposing this standard on all dwelling types (including market homes) may not deliver the required homes in the correct location. For example, an ageing population does not automatically correspond to more households that require accessible homes and often people that require more accessible homes will choose to adapt their existing home, rather than to move to a new build home that has been built to accessible or adaptable standards.	Noted. Consider comments in the finalisation of the policy.
HOU8	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Policy HOU8 requires all new homes to be built to part M4(2) of the Building Regulations and 5% of dwellings on sites of over 20 units to be provide wheelchair adaptable homes in line with part M4(3). When the optional technical standards were introduced the Government stated in the relevant Written Ministerial Statement that their application must be based on a clearly evidenced need for such homes and where the impact on viability has been considered – a position that is now reflected in footnote 46 of the 2019 NPPF – with further detailed guidance being provided in PPG. In addition to needs and viability PPG requires the Council to also consider: • the size, location, type, and	Noted: Noted Consider comments in the finalisation of the policy. Disagree- Background paper no 7 sets out the evidence base for this requirement. The national space standards are intended to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>quality of dwellings needed; • the accessibility and adaptability of the existing stock; and • variations in needs across different housing tenures. The evidence on need provided by the Council in the draft local plan is based principally on the Council ageing population. Yet just because there is an ageing population does not necessarily mean that there is an increase in the proportion of households requiring more accessible homes. For example, the English Home Survey, which examined the need for adaptations in 2014/151, noted that 9% of all households in England had one or more people with a long-term limiting disability that required adaptations to their home and that this had not changed since 2011-12. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs. In addition, the survey indicated that those over 65 that required an adaptation to their home were more likely to consider their home suitable for their needs. So, whilst there is an ageing population there may not be a consequential increase in the need for adaptations or more adaptable homes. Many older people are evidently able to adapt their existing homes to meet their needs or find suitable alternative accommodation. A new home built to the mandatory M4(1) standard will therefore be likely to offer sufficient accessibility for the rest of their lives and as such to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period. Recommendation The Council should reduce the proportion of new homes to be provided as part M4(2) as there is insufficient evidence to justify all new homes being built to this optional technical standard.</p>	<p>responding to occupants needs. The population of North Norfolk aging at one of the fastest rates in the country, invoking the minimum national space standard through the Local Plan is also considered to be important in relation to long term adaptability and sustainability.</p>
HOU8	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP309	Object	<p>Policy HOU8 seeks to apply what is already an optional standard, to 100% of new dwellings conform to the requirements of Part M4(2) of the 2015 Building Regulations. This represents a radical and unwelcome approach to addressing an existing shortfall. At present all of Norfolk Homes Ltd.'s open market and shared equity houses comply with Part M 2004 Regulations, which is the same as the current mandatory Part M4(1) 2015 Regulations. Its current Affordable Rented house types are designed to comply with the Lifetime Homes Standards and will satisfy the new Part M4(2), which is what draft Policy HOU8 is seeking to apply. Meeting the requirements for the WC/cloakroom provision on smaller house types is extremely challenging (as minimum finished footprint area requirement is to be not less than 1450 x 1800mm). All 1, 2 and some 3 bed dwelling types will require enlarging/remodelling to achieve this. Further reworking of bathrooms and bedrooms will also be needed. All of which have implications for viability. The second bullet point of Draft Policy HOU8 requires that 5% of dwellings on sites of 20 or more units should be wheelchair adaptable. Whilst Norfolk Homes has already applied this design requirements on existing dwellings (notably at Roughton Road, Cromer), it should be borne in mind that these require larger plot area allocations on a site-by-site basis. Sloping sites will in particular be a challenge, in respect of access</p>	<p>Noted: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging policies on the economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5%</p>



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				and parking. The draft policy should bear in mind constraints such as the topography of a site. Before seeking to apply such a policy across the board, the Council ought to be aware of the practical and financial implications to a housebuilder. Additional work/cost is required by the policy: "All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards...". "Applicants must submit appropriate supporting evidence of sufficient details to enable consideration, including a viability appraisal". A requirement for even more supporting documentation is entirely at odds with the Government's state intention of reducing the burden on house builders and ensuring the planning system is quicker, efficient and more responsive in delivering houses. The policy is an example of planning seeking to interfere with issues squarely in the remit of the Building Regulations, and for which a planning policy is entirely superfluous. Planning policies should go no further than being prescriptive on the affordable rented dwellings; everything else should be left to housebuilders, Building Regulations and the market/s in which they operate. An unintended consequence of this policy would be an adverse effect on the provision of smaller dwellings, resulting in fewer being built, and those being more expensive. I believe the problems inherent in the policy are demonstrated by the caveats setting out exemptions and viability constraints (e.g. "Exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm the viability of the scheme" [our emphasis]. Draft Policy HOU8 is excessive, onerous and superfluous. The Council should be cautious in readily dismissing viability impacts: not only would M4(2) and M4(3) increase build costs but in practise likely increase dwelling and curtilage sizes, and thereby reduce build density on site (reducing the number of houses to be built), with various implications	contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.
HOU8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Recognises the importance of providing accessible and adaptable homes. The requirement to meet the necessary Building Regulations is supported to ensure homes can be lived in by all members of the community.	Support Noted.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU8)
Objection	2	The council's aim was generally supported across the development industry, but caution was raised as to the justification and application particular across all development. Although the age structure was acknowledged the significant uplift in the housing target in order to address affordability was used to suggest that the approach should not seek higher adaptable standards across all housing and the policy should be reduced to apply to only a proportion of properties. Other comments focused on the Council providing more detail and prescription of the requirements. Norfolk Homes however thought the approach was "an unwelcome approach to addressing an existing shortfall " and an interference with issues that sit with Building Control, though confirmed that their affordable homes already comply to M4(2) and previous developments in Cromer the M4(3) requirement which the policy is seeking to apply,
Support	3	
General Comments	2	

		extending the approach to market housing would utilise extra space and unwelcomed costs. They suggested that the requirements would lead to fewer smaller homes being built and more expensive housing. It was inferred that further consideration of viability and unintended consequences should be looked at in the finalisation of the policy.
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### Alternatives

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU8	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).

## Policy HOU9 - Minimum Space Standards (Regulation 18 Responses)

### Individuals

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

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

### Parish & Town Councils

No comments received.

## Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU9	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216792)	LP237	Object	The policy as worded is overly prescriptive and places a burden on applicants to provide additional and unnecessary information in support of applications. The 2015 Ministerial Statement set out to simplify the planning process by reducing the amount of supporting evidence required to be submitted by applicants	Comments noted. The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. Being transparent at application stage is an important factor in determination. Consider the inclusion of supporting statement in Design and access statement
HOU9	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP685	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Larkfleet suggest that policy HOU9 should be worded in such a way as to allow flexibility when determining planning applications, as prescribing space standards for homes can impact upon the affordability of such homes. It should be noted that Homes England take a flexible approach to applying the standards in respect of affordable homes. Larkfleet believe the uniform approach of the policy does not take into account the viability on a site-by-site basis. This policy requires additional work and costings as information on how the planning application meets minimum space standards is required for validation.	The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. The approach is included in the viability assessment.
HOU9	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP538	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Persimmon Homes (Anglia) share the views of the HBF that there is insufficient evidence to suggest that homes slightly below national space standards have not sold or that such homes are not meeting their owner's requirements; <ul style="list-style-type: none"> <li>• Persimmon Homes (Anglia) agree with the HBF that the Council's approach of collating evidence of the size of dwellings completed does not accurately and robustly reflect need, the requirement for which is set out in the NPPG or local demand as set out in the NPPF, and that it would be expected that the evidence base should also take account of market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the</li> </ul>	Noted, consider comments in the finalisation of Policy HOU9. Disagree- Background paper no 7 sets out the evidence base for this requirement. The national space standards are intended to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of responding to occupants needs. The population of North Norfolk aging at one of the fastest

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>standards;</p> <ul style="list-style-type: none"> <li>In terms of supporting evidence, the Council's evidence base fails to take account of market information reflecting customer levels of satisfaction for new homes. In neglecting to take account of customer satisfaction levels, Persimmon Homes (Anglia) contend that the Council have failed to demonstrate a need to adopt an internal space standard, as required by the NPPF (footnote 46).</li> <li>Persimmon Homes (Anglia) contend that if a space standard were to be imposed on all new houses, this would inevitably inflate sale prices to take account of increased land take for each dwelling and an increase in construction costs. This is likely to disadvantage those people wishing to get onto the housing ladder with an affordable, high-quality property.</li> </ul>	<p>rates in the country, invoking the minimum national space standard through the Local Plan is also considered to be important in relation to long term adaptability and sustainability.</p>
HOU9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Supports high quality design that delivers functional and liveable homes; being spacious and well-proportioned is a key tenet of this</p>	Support Noted.
HOU9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP625	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Whilst we support the policy aspiration to provide high-quality well-designed homes and confirm that site C10/1 can comply with the emerging policy, the implications and potential site-specific circumstances in respect of the policy need to be taken into account. In the absence of specific evidence to justify a blanket approach to minimum space standards, we would suggest that this policy aspiration may be better delivered through a requirement for details of individual dwellings (using the criteria set out in the draft policy) to be provided at the planning application stage to enable space standards to be assessed on a scheme-by-scheme basis. This would also take into account the fact that small houses can also contribute to meeting housing needs and can often be more affordable, helping to increase access to home ownership, in particular for first time buyers. A further consideration that the Council may wish to be mindful of is the implication of the policy on the number of bedrooms that can be provided in a property of an equivalent size if the minimum space standard is applied, with potential implications for overcrowding. For example, a four-bedroom home may become unaffordable to a family that requires that number of bedrooms, if a home that would have otherwise been a small entry level four-bedroom home becomes a large three-bedroom home as a result of the application of the standards. As such the policy could result in market homes becoming less affordable or result in family units occupying overcrowded accommodation, contrary to the aims of the policy. There are also potential implications for affordable housing delivery as a result of the space standards potentially resulting in larger, but fewer, affordable homes.</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
HOU9	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>Minimum space standards (HOU9) proposes to adopt national minimum space standards (NDSS) for residential development in North Norfolk. The Council suggests that the application of these standards will ensure a reasonable level of amenity and quality of life. However, there is no evidence or justification confirming that the introduction of the NDSS will improve the quality of housing or that these will improve the living environment for residents. There is also no evidence presented to indicate that homes slightly below space standards have not sold or that such homes are not meeting their owner's requirements. We consider that additional space does not necessarily equal improvements in quality. There must be concerns that the introduction of the NDSS could lead to people purchasing homes with a smaller number of bedrooms, but larger in size due to the NDSS, which could have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. The HBF consider that the Council's approach of collating evidence of the size of dwellings completed does not, in itself, identify need as set in the PPG or local demand as set out in the NPPF. It would be expected that the evidence includes market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards. The HBF in partnership with NHBC undertake a Customer Satisfaction Survey annually to determine the star rating to be given to individual home builders. This is an independently verified survey and regularly demonstrates that new home buyers would buy a new build home again and would recommend their homes builder to a friend. The results of the 2017/18, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design of their new home, 93% of those who responded were either fairly satisfied (28%) or very satisfied (65%). This does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided. We consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. Essentially it could mean that those families requiring a higher number of bedrooms will have to pay more for a larger home. The industry knows its customers and what they want, our</p>	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
				members would not sell homes below the enhanced standard size if they did not appeal to the market. Recommendation We do not consider that this policy is required and that local needs can be met without the introduction of the nationally described space standards. However, if the policy is considered to be justified, we would suggest that the policy is made more flexible to allow for support development schemes including smaller well-designed homes where it is required to make a development viable and deliverable.	
HOU9	Creeting and Coast, Mr John Fairlie  (1217414)	LP543	Support	There should not be a requirement for a separate document. For major development, this can be discussed within the Design and Access Statement.	Noted Consider comments in the finalisation of the policy: Consider whether this could be included within the Design and Access Statement.
HOU9	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP586	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The requirement to meet nationally described space standards is considered to be reasonable and reflects a broader shift by LPAs towards a standardised approach to their housing policy on this matter. The relevant information proposed to accompany development proposals in this regard is also considered reasonable, but it is considered unnecessary to prescribe that this is set out in a separate document (when ordinarily it should be included within a Design & Access Statement), or that this should apply to all applications, as at outline planning stage this information will not be available.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU9)
Objection	3	Feedback from development industry offered mixed view to the proposed approach. Although high Quality design, functional and spacious homes were supported along with the Council's aspiration some suggested there was no evidence to suggest that adoption of the standards will improve the quality of housing or living conditions and the unintended consequences of people purchasing larger homes but with less bedrooms leading to overcrowding. The HBF point to high levels of satisfaction in internal design of new homes as justification to their general comment as well as raising issues around affordability and that the council's review of size does not reflect need. They suggest that more flexibility is required in the application of the policy around deliverability and viability. Others objected to the requirement to submit a separate document setting out how proposals would comply, suggesting that the requirement was too prescriptive and placed a burden on applicants. Consideration should be given to including this requirement in the Design and Access statement as a solution. Support was also given for the ambition and some advised that the approach was reasonable and support the shift towards liveable homes.
Support	4	
General Comments	1	

## Alternatives

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU9	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).



## Policy HOU10 - Water Efficiency (Regulation 18 Responses)

### Individuals

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

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

### Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU10	North Walsham Town Council (1218408)	LP730	Support	We recommend that the 110 litres/person/day is applied across the NNDC	Support for the policy approach is welcomed
HOU10	Cley Parish Council (1217592)	LP653	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Fully Support water efficiency proposal	Support welcomed

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

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

## Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU10	Anglian Water (1217129)	LP354	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. We would fully support the optional water efficiency standard being applied within the North Norfolk Local Plan area. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems. Further details of	Support welcomed: Consider feedback in the development of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				Anglian Water's approach to green water proposals is available to view at: <a href="https://www.anglianwater.co.uk/developers/green-water.aspx">https://www.anglianwater.co.uk/developers/green-water.aspx</a> . We would ask that Policy HOU 10 be amended to refer to specific measures which would allow developers to improve go beyond this standard which has wider benefits and that these will be encouraged by the District Council. Proposed that Policy HOU10 be amended as follows: 'For residential development, proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2 Water reuse and recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.'	
HOU10	Natural England (1215824)	LP724	General Comments	We understand that a water cycle study is being prepared to form part of the North Norfolk Local Plan evidence base. This information should feed into the evolving HRA and Sustainability Appraisal.	The Council has worked with infrastructure providers and the EA. to consider constraints and capacity issues including water supply, wastewater and its treatment in the development of the Plan

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Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU10)
Objection	0	Limited feedback received - No issues raised. Support for this approach was received from Anglian water who provided for consideration some amended wording which would encourage developers to go beyond the national standard which has wider benefits to the District.
Support	1	
General Comments	1	

### Alternatives

No comments received.

## Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction (Regulation 18 Responses)

### Individuals

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

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
				facts about the costs and benefits of any future plans. Since declaring the climate emergency, all housing needs to be at minimum construction costs and with the minimum use of carbon for heating, and any carbon costs need to be offset.
HOU11	Broadhead, Ms Beverley (1217202)	LP289	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Establishing a 'North Norfolk Rule' for reducing the impacts of Climate Change. The "Merton Rule" was established in 2003 to ensure that all commercial buildings have to create at least 10% of their energy from renewables. This is old hat. Renewables are far less expensive and much more available than in 2003 so such a rule needs both to be upgraded and considerably widened. We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.
HOU11	Bell, Ms Jane (1218416)	LP799	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Strongly support this crucially important policy as a response to paragraphs 9.49 & 9.50. (Paragraphs 9.76 & 9.77 are particularly valid.) However, it lacks equally crucial detail and there is a huge difference between desirability ( the auxiliary verb 'should', i.e. 'duty', 'obligation', is repeated) and an enforceable imperative. Suggested Change In practice, are developers going to install, for example, photovoltaic panels and ground source heat pumps? Are they prepared to cover the cost which will have to be passed on to the owner? And what happens if/when it becomes statutory (?) for gas consumption to be phased out? p. 235
HOU11	Green, Mr Stephen (1218541)	LP770	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> All new homes must be carbon-neutral as far as possible. This means: a. they must be able to generate most of their power, heating, and hot water requirements through solar thermal, solar PV, and ground source and air source heat exchangers. These technologies all exist and if they are incorporated into new build their add-on cost is negligible. This will increase demand for local supplies of the necessary products, installers, and maintenance staff, thus creating more local industries and local jobs. b. They must be as well insulated as possible. Probably triple-glazed, and meeting the highest standards of thermal insulation. c. The process of building them must be as low-carbon as possible and any surplus embedded energy must be mitigated.  All new homes must be sustainable. This means: b. They must not have gas or oil supplies to them. c. Biomass boilers are not sustainable and must not be installed.
HOU11	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There are useful elements within this policy; in particular, those enumerated within item 1b - "incorporation of measures to maximise opportunities for solar gain through building orientation..." and so on. Just the same, we are not persuaded that the policy is sufficiently demanding. As we have observed elsewhere, North Norfolk has declared a climate emergency. A reduction in CO2 emissions of only 19% below the target emission rate of the 2013 edition of the 2010 Building Regulations would seem a paltry ambition when there are so many examples of Passiv or carbon neutral housing to be found. We believe too that this policy should make provision for schemes of community energy, for example air and ground source heat pumps and photovoltaic panels. We would like to see a higher target for the reduction of CO2 emissions with a requirement for community energy schemes to be designed into new developments of all kinds, whether residential or employment sites.

Individuals	Number Received	Summary of Responses (Policy HOU11)
Summary of Objections	3	Objections received to this policy generally supported it but thought it did not go far enough, considering that the policy could do more to ensure that all homes are of the highest environmental standard and move towards carbon-neutral.
Summary of Supports	1	One specific response supported the policy.
Summary of General Comments	9	General comments supported the need for a policy but a larger emphasis was needed on ensuring developers deliver appropriate and high environmental standards in response to the declaration of a climate change emergency by the Council. All new homes should be carbon-neutral, sustainable, Passive House standards, with solar and heat pumps and grey water recycling and the policy approach should be more prescriptive with developers moving away from reliance on fossil fuel for heating now. Support for Large sites including allotments, planting of trees and wild areas along with electric charging points within each residential unit was clear.
Overall Summary		The policy doesn't go far enough - all homes should be of the highest environmental standard and should be located close to facilities to minimise car use and the policy should be more robust to meet the growing challenges. Should introduce a new North Norfolk Rule. Plan out of date as developed before climate emergency declared. Policy lacks crucial detail to make it enforceable. New homes should be carbon neutral to Passive House standard with solar, heat pumps and grey water recycling and electric charging points. Any carbon needs to be offset. Large sites should have allotments and trees/wild areas. Introduce Park and Ride. Suggest that this policy make provision for schemes of community energy, for example air and ground source heat pumps etc. and like to see a higher target for the reduction of CO2 emissions.
Council's Response		Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future in accordance with the 2015 written ministerial statement and the Government's new net zero target moving toward net carbon by 2050. Meeting the target by 2050 will require further significant increase in the use of renewable technologies and the switch to low carbon heating such as heat pumps. The Government is consulting (Oct -Dec 2019) on a future homes standard through building regulations that includes options to increase energy efficiency standards for new homes in 2020 and a requirement to ensure future homes to be future proofed with low carbon heating by 2025. Changes in national policy will also need to be considered in the finalisation of this policy.

## Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU11	Sheringham Town Council (1217426)	LP548	General Comments	STC would like to see NNDC attempt to reduce the impacts of Climate Change through the planning system. The existing 'Merton Rule' which ensures all new commercial buildings create at least 10% of their energy from renewables is out-of-date. A new rule could set staged targets for efficiencies of energy, carbon removal, water reduction and waste recycling. This new rule could be designed into planning permissions/conditions. • There needs to be an approach to local planning that addresses the Climate Emergency	Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				<p>that has been declare by NNDC and STC. An environmental impact assessment needs to be conducted and implemented as to the environmental impact of the local plan including the design guides in order to address the concerns of councils and our community, which have led to the declaration of a Climate Emergency. As a result STC expect to see NNDC reduce the impacts of climate change through the planning system. The existing 'Merton Rule', which ensures all new commercial buildings create at least 10% of their energy from renewables is out of date. A new rule could set staged targets for efficiencies of energy, carbon removal, water reduction and waste recycling. This new rule should be designed into planning permissions and conditions. Sheringham Town council expects NNDC to uphold and enforce those climate related principles and rulings in the process of approving planning applications.</p>	<p>take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. • The Local Plan is informed by a sustainability appraisal which reviews the key environmental, social and economic considerations that affect the District</p>
HOU11	Cromer Town Council (1218420)	LP732	General Comments	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The "Merton Rule" was established in 2003 to ensure that all commercial buildings have to create at least 10% of their energy from renewables. This is old hat. Renewables are far less expensive and much more available than in 2003 so such a rule needs both to be upgraded and considerably widened. We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.</p>	<p>Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU11	North Walsham Town Council (1218408)	LP730	Object	The Town Council also believes that careful attention should be given to roof orientation within the proposed developments in order to maximise the efficient generation of solar energy. We suggest that rainwater harvesting should be required, not simply recommended. Amend Rainwater harvesting: This is the collection of water that would otherwise have gone down the drain, into the ground or been lost through evaporation. Large surfaces such as roofs and driveways are ideal for rainwater harvesting. Generally green roofs do not provide as much harvesting potential as traditional roofing materials, so the use of rainwater harvesting and green roofs on the same building requires careful consideration. This water is not suitable for drinking but can be used for flushing toilets, watering gardens and even supplying the washing machine. Rainwater harvesting has the potential to save a large volume of mains water and therefore help reduce the pressure on water resources. Water butts to supply garden watering requirements are the simplest form of rainwater harvesting system, their installation is required in all new dwellings	Consider comments in the finalisation of the policy.

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

## Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Anglian Water (1217129)	LP355	Support	Anglian Water is supportive of Policy HOU 11 which will help to reduce demand on water resources by demonstrating greater water efficiency.	Support noted
HOU11	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216793)	LP238	Support	Requirement of separate Energy Statement places a burden on applicants to provide additional and unnecessary information in support of applications. The 2015 written Ministerial Statement set out to simplify the planning process by reducing the amount of supporting evidence required to be submitted by applicants. It is sufficient to include reference to these matters within a Design and Access Statement	Support (partial) welcomed. Consider comments in the finalisation of the policy wording. Consider the inclusion of supporting statement in Design and access statement



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP541	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Persimmon Homes (Anglia) are broadly supportive of Policy HOU 11. However, Persimmon Homes (Anglia) draw attention to the potential viability implications of allowing an adjustment to the 19% reduction in the event of being superseded by national policy or legislation in the future. Development viability is assessed taking account of the measures that would be necessary to achieve the 19% reduction in emissions. If this figure were to change in the future (post plan adoption), it would inevitably carry a cost implication for new development, which, in turn, may carry implications for development viability. Persimmon Homes (Anglia) would therefore expect North Norfolk to consider the potential implications of any future adjustment to the 19% reduction figure and to acknowledge and make provisions for, the associated viability implications within the supporting text of the Policy.	Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. The Government has recently consulted on moves towards reducing reliance on fossil fuel heat sources and introducing carbon zero homes through building regulations . The consultation document indicates that such additional costs should be borne by the land owner in the price of land. (in line with the NPPF.PPG)
HOU11	North Norfolk Constituency Labour Party (1215750)	LP120	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The North Norfolk Labour Party feel that the current building standards are not of a level that will substantially reduce energy use. <ul style="list-style-type: none"> <li>• New builds should include solar thermal (solar heated hot water), solar PV (electric) air source &amp; ground source heat pumps, and these should be policy requirements for all new builds.</li> <li>• There should be carbon off-set modelling for an entire project, so that we work towards a whole development being carbon neutral. We are losing a lot of land and we will be generating a lot of greenhouse gases, which must be offset this somehow.</li> <li>• There is also the case of our area experiencing ever increasing water stress, therefore, new builds should be designed for maximum water capture and recycling.</li> </ul>	Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design. Climate Change is recognised as an important consideration to the Council and further consideration

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole.
HOU11	Historic England (1215813)	LP705	Object	Listed buildings, buildings within conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations/exceptions should be reflected in the policy. In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings <a href="https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf/">https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf/</a> to be helpful in understanding these special considerations.	Noted - consider the wording of Policy HOU 11 and how this relates to the Historic Environment in the preparation of the policy.
HOU11	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The approach set out in Policy HOU11 of prioritising “designing out” emissions followed by use of low carbon technologies is supported. As with several other policies, it is suggested that HOU11 could be simplified through referencing NPPF paragraphs 150-154.	Support Noted.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP626	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Whilst we support the policy aspiration to achieve high standards of environmental sustainability, further evidence is required on why the target of a 19% reduction in CO2 emissions has been selected (other than to achieve an equivalent to the Code for Sustainable Homes Level 4) to fully understand whether the draft policy is the best way to achieve the Council's objectives, bearing in mind that this will not help to reduce the energy efficiency of existing housing stock and the fact that Government is expected to consult on a new Part L of the Building Regulations later in 2019 with an updated document to be published in 2020.	Support noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. The Government has recently consulted on moves towards reducing reliance on fossil fuel heat sources and introducing carbon zero homes through building regulations.
HOU11	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP311	Support	The implementation of an energy hierarchy whereby energy efficiencies through design/fabric over renewable energy/low carbon 'add-ons' is welcomed; it is an approach promoted by Norfolk Homes through its own designs and development proposals during the course of the current Core Strategy, if not before. However, the Council should be aware that the provisions of Policy HOU11 (19% reductions below the Target Emission Rate of the 2013 Building Regulations (Part L)) are likely to necessitate a significant proportion of applications seeking flexibility via constraints of technical feasibility and viability. The draft policy's provision will have a significant impact on the approach to site layouts, where dwellings will need to be orientated in a more energy efficient manner, but also affect building design in order to maximise building orientation. It will also potentially restrict the materials pallet to be used on a development. In turn, these will impact on density and viability issues. Building orientation will be paramount in future schemes, in particular in order to avoid a predominance of bland, grid formations in housing schemes. The requirement that "all development proposals should be accompanied by a separate Sustainability Statement..." appears especially onerous. Does the policy actually mean all development proposals (i.e. all planning applications)?	Support noted. Consider comments in the future iteration of the Plan.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU11)
Objection	0	All respondents from the development industry were supportive of this policy and the designing out of emissions followed by the use of low carbon technologies. No substantive issues were raised. A number of issues were put forward for further consideration, these included: The removal of the requirement to include a separate energy statement (on all development) - instead allow developers to incorporate supportive information in the Design and access Statement. Further consideration around the impacts on viability and density due to the impacts on site layout and potential restrictions on development materials. One organisation suggested that the policy should be more prescriptive in its use of renewable technology and a demonstration how development twill achieve carbon neutrality.
Support	6	
General Comments	0	

## Alternatives

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU11	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).

## 1 - Policy HOU8: Accessible & Adaptable Homes

Local Plan Regulation 18 text

**The purpose of this policy** is to ensure that new homes are accessible and can be easily adapted as people's needs change throughout their lifetime.

This policy will increase the amount of homes that are suitable for an aging population, leading to positive impacts on health and well-being, and will increase the supply of decent homes that meet a wider range of needs. Making homes adaptable and accessible from the start will reduce the likelihood of people having to leave their homes as their needs change and allow people to stay within their local communities, fostering mixed and inclusive communities.

9.52 North Norfolk has one of the highest percentage of older people in the country. The population is aging and the trend is accelerating so that by 2036 it is expected that there will be an additional 11,500 residents over the age of 65. Overall the percentage of people aged over 65 will increase from 32% to 39.9% of the District's population in comparison to the England average of 23.4% (69). Significantly the higher age cohorts of over 80 years of age are projected to increase at the fastest rate and will account for up to 14% of the District population by 2036. With peoples housing needs changing over time, homes need to be designed in such a way as to meet those changing needs. A person's age has a direct link with a greater likelihood of mobility issues. Declines in some areas of health, for example, increases in obesity have contributed to an increase in people experiencing mobility issues. There is a historic deficit in 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 in residential care it is important that we ensure that more accessible homes are provided in the District and that adaptations are easier and cheaper to undertake when they are required.

9.53 The National Building Regulations include specific nationally agreed construction standards (the M4(2) standard) which if adopted through this Plan would deliver accessible and adaptable homes. This standard is broadly equivalent to, and replaces the former Lifetime Homes standards, which the Council encouraged in its existing Core Strategy Policy HO1. Homes built to this standard are more flexible and readily adaptable as people's needs change. They are suitable not just for the elderly but also for families with pushchair needs, or those with a temporary or permanent disability or health issue.

9.54 A proportion of new dwellings that accord with Category M4(3) wheelchair adaptability on larger housing developments is also required. It is estimated that the national unmet need for wheelchair adaptable properties is the equivalent of 3.5 per 1,000 households, representing approximately 385 households of the Local Plan housing target of which 186 should be in the affordable sector. (70). Planning Practice Guidance states that M4(3) should only be applied to properties where the LPA is responsible for allocating, or nominating \ person to live in that dwelling, (71) i.e the requirement is based on affordable housing provision only. However given the level of need the intention is that the requirement will be applied to all larger housing developments, over 20 units irrespective of tenure. The policy will be applied flexibly with regard to the current evidence at the time of any planning application. For example, taking account of the Council's Strategic Housing Needs Assessment, Housing Register and any other sources of up to date information.

~~9.55 Where the specific requirements of Building Regulations may not be achievable, an element of flexibility is recognised as being required in the delivery of these standards. This may be due to, site specific challenges around topography, flood risk and/or the relationship to design. Where developers demonstrate that the M4(2) or M4(3) requirements are not feasible to be delivered on viability grounds exemptions will be on a case by case basis on the clear evidence submitted at planning application stage, e.g. the topography of the site makes provision as a whole not feasible and impacts development viability significantly.~~

~~9.56 Monitoring of compliance with the standards will be through Building Regulations. Developers are encouraged to demonstrate and include a greater level of water efficiency / water consumption reduction measures as part of their developments. For example specific reference could be made around the use of water efficiency/re-use measures in a proposal – examples of which include water re-use, rainwater harvesting and stormwater harvesting.~~

### **Updated Reasoned justification**

**The purpose** of this policy is to ensure that new homes are built to accessible and adaptable standards and as such can 1) be easily and cost effectively adapted as people's needs change throughout their lifetime; 2) increase the overall percentage of appropriate housing across all housing types and tenures; 3) address the historical deficiency in supply.

This policy brings positive impacts on health and well-being, and complements the overall approach to adult care provision through planning by increasing the supply of decent homes in order to meet the needs of an aging population, save on future health and social care costs and provide choice and flexibility around the housing options available. Peoples housing needs change as they get older, and homes designed this way from the outset provide safe and convenient approach routes, circulation space and appropriate kitchens, bathrooms, and outside space as well as making them more easily and cheaper to adapt should the need arise in the future, allowing people to stay independent longer and stay in their own homes longer. Making homes adaptable and accessible from the start increases the likelihood of people having to leave their homes for specialist housing as their needs change and allows people to stay local, fostering mixed and inclusive communities.

North Norfolk has one of the highest over 65 populations as a proportion of its total population and a high percentage of home ownership. ONS publications consistently report that this age cohort is the fastest growing age cohort in the District. The Old Age Dependency Ratio, expressed as a proportion of people of state pension age per 1,000 working dependents is projected to be 640 by 2026<sup>1</sup> and is significantly higher than the regional and national averages of 335 and 303. The population is aging and the trend is accelerating. By 2036 it is projected that there will be an additional 11,500 residents over the age of 65, increasing the percentage of people aged over 65 from 32% to 39.9% of the District's population, nearly double the England average of 23.4%.<sup>2</sup> Significantly the higher age cohorts of over 80 years of age are projected to increase at the fastest rate and will account for up to 14% of the District population by 2036.

The 2011 census shows that around a quarter of districts population reported a long term disability or health condition while approximately a third (30%) of all households were further identified with limiting long term illness and dependent children. The Institute of Public Care research points to a raise in the number of people living with mobility problems and dementia over the Plan period. Within the demographics of North Norfolk this points to a 49% rise in those with limiting long term illness

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<sup>1</sup><https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based>

<sup>2</sup> ONS Subnational projections 2016- NNDC Optional Technical Standards Topic paper, 2018.

(activity limited a lot) and a 65% rise in dementia. As such the number and proportion of the population that will have to cope with mobility and declining mental health issues is rising significantly.

With public health and social care strategies placing significant emphasis on supporting people in their own homes rather than in residential care it is important that we ensure that more accessible homes are provided in the District and that adaptations are easier and cheaper to undertake when they are required. Unsuitable and unadaptable housing can have negative effects both mentally and physically which can impact on lifestyle, employment opportunities and health. There is a historic deficit in 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 and overall proportion of accessible and adaptable homes is significantly increased.

The introduction of the category 2 optional standards in relation to accessibility and adaptability are not only justified on the grounds of the District's aging population. Homes that meet these standards are well laid out, flexible to live in, and contain features and measures that benefit everyone, including families, home workers and people with temporary or permanent mobility issues or illnesses. North Norfolk has the highest proportion of those in employment working from home in the East of England at 12.3%, compared to 8.6% East of England average. This coupled with changing expectations, increased homeworking in recent times, a low wage economy and the need to retain and attract working age population, dwellings need to be functional and adaptable across the whole market and assist in the retention and attraction of those of working age.

The Standard broadly equates to the Lifetime Homes standard that was encouraged through previous Core Strategy policy H01, but was withdrawn by the Government following the National Standards Review and the introduction of optional building standards. The introduction of the optional requirement through Plan review is not considered a significant change to ambition or policy.

The policy approach evokes Category M4(3) standards and requires that a proportion of new dwellings on larger housing developments are also required to meet the needs of wheelchair users and allow for the simple adaptation of the dwelling for future wheelchair users.

Evidence established in section 5 of the Local Plan Background Paper no 7 highlights the fact that households whose day-to-day activities are 'limited a lot' through long-term illness or disability is more prevalent for residents housed in the private sector. Nevertheless, current national policy directs the application of optional requirement M4(3) to where the local authority is responsible for nominating a person to live in that dwelling. The evidence estimates a wheelchair accessibility need (current and future) of approximately 10.5% of households in order to meet unmet and future need in an affordable property.

Given the projected large increase in population in the over 65 age cohorts and in particular, the over 85s, coupled with the high levels of home ownership, the identified affordable need is arguably at the lower end of the District need. The intention is that the M4(3) requirement will be applied to all larger housing developments over 20 units irrespective of tenure. The policy could be applied to only the affordable requirement but equally it could be split over the entire development of market and affordable housing. Developers should seek further advice on the most appropriate split according to the latest evidence through pre application enquiries.

The viability of requiring enhanced accessibility or adaptability standards over and above building regulations has been tested in the Local Plan Viability study 2018. The study concludes that there is

sufficient headroom across all areas and development typologies for new development to meet optional technical standards. Affordable housing is confirmed to be able to meet the costs in Local Plan consultation feedback<sup>3</sup> and the government's own cost impact study shows that significant proportions of additional costs can be recovered through sales value increases especially when there are perceived extra values in relation to space<sup>4</sup>.

The Councils will only consider exemptions to these requirements where the applicant can provide evidence to robustly demonstrate that it is not practical to achieve given the physical characteristics of the site and in line with the requirements Council's Developer Contribution and viability policy provide a robust, transparent viability assessment that accords with the Council's methodology that the requirement would significantly harm the financial viability of the scheme.

Planning applications are required to include sufficient detail in submitted documentation to allow determination of compliance for each housing type proposed **as a validation requirement**. This should not be left to the interrogation of designs and drawings. A separate statement and or inclusive section in any Design and Access statement is required.

Monitoring of compliance with the standards will be through Building Regulations.

#### **Policy HOU8: Accessible & Adaptable Homes**

All new homes must be designed and constructed in a way that enables them to be adapted to meet the changing needs of their occupants over their lifetime **and comply with or exceed the Government's Accessible and Adaptable Standards or successor**. Planning permission will be granted for new dwellings subject to:

- all new dwellings meeting the Building Regulations M4(2) standard: Category 2 – Accessible and Adaptable Dwellings<sup>5</sup>;
- 5% of dwellings on sites of 20 units or more being provided as wheelchair adaptable dwellings in accordance with the Building Regulations M4(3) standard: Category 3<sup>6</sup>.

Exemptions will only be considered where the applicant can robustly demonstrate that compliance: ~~would significantly harm the financial viability of the scheme. All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards as detailed in Building Regulations. Where exemptions are sought on practicality or viability grounds, the minimum number of units necessary will be exempted from the requirements.~~

- **is not practical to achieve given the physical characteristics of the site; and**
- **would significantly harm the financial viability of the scheme.**

**Where exemptions are sought on practicality or viability grounds, the minimum number of units necessary will be exempted from the requirements.**

~~All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards as detailed in~~

<sup>3</sup> Consultation Statement Schedule of representations (REg18) policy HOU8 consultation feedback,

<sup>4</sup> No additional sales uplift is applied to the council's Reg 18 viability study

<sup>5</sup> Or any subsequent national equivalent standard adopted by the council should the Building Regulations and or national policy be reviewed in the future

<sup>6</sup> Or any subsequent national equivalent standard adopted by the council should the Building Regulations and or national policy be reviewed in the future



~~Building Regulations. Where exemptions are sought on practicality or viability grounds, the minimum number of units necessary will be exempted from the requirements.~~

All development proposals at application stage will set out how proposals, including for each dwelling type, comply with, or exceed the standards in the Design and Access statement or equivalent separate statement.

~~Applicants must submit appropriate supporting evidence of sufficient detail to enable consideration, including a viability appraisal.~~

## 2 - Policy HOU9: Minimum Space Standards

### Updated Reasoned Justification

**The purpose of this policy** is to ensure that new homes offer a reasonable **minimum** level of residential amenity and quality of life, ensuring that there is sufficient internal space, privacy and storage facilities to ensure long term sustainability and usability of new homes.

The nationally described space standard deals 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. ~~The standards are optional unless required locally via Plan policies.~~

~~Overall~~ The national space standards are intended to ensure that new homes, **and conversions and dwellings provided through permitted development rights including those that require prior approval** provide a flexible and high quality environment in line with the NPPF, capable of responding to occupants changing needs **and circumstances**. With the population of North Norfolk aging at one of the fastest rates in the country invoking the optional minimum national space standard through the Local Plan is considered important in relation to **meeting identified needs**, long term adaptability, **and sustainability** and in **creating sustainable communities**. Larger floor areas provide the opportunity for easier adaptability due to **changing circumstances such as** impaired mobility **and the requirement for liveable/ work space**, and is a key criterion in relation to how accessible a dwelling is. There is some overlap between the Space Standards and the Accessible and Adaptable standards, but the introduction of the national space standard complements and does not negate the requirement for M4(2) and M4(3) compliance.

~~The provision of sufficient space in dwellings is an important element of good design and influences the take up and delivery of new housing. A lack of space can compromise basic lifestyles needs, such as household space to play, relax, privacy, private work space, and storage of possessions. It can have significant life effects on health, family relationships, educational attainment and social cohesion. The Governments own housing standards review concluded that the UK builds some of the smallest homes in Europe (74) and there has been a downward trend in house sizes across the UK. It is widely reported that the key desirable factors when considering a new home include the provision of adequate space (living and storage) inside and outside the home, along with the proximity to services.~~

Analysis of new homes being built on housing estates across North Norfolk reveals that approximately 58% of dwellings being built do not meet one or more of the minimum national space standards. For Flats this falls to 50%. Sixty-nine percent of the development in North

Norfolk meets the space standards for gross internal space, dropping to 61% for the 1-2 & 3 bed properties i.e 39% do not meet the minimum space standard. In the larger 4+ bedroom dwellings the figure is much higher at 95.3% meeting the standard. The internal configuration of some dwellings with smaller bedrooms, is leading to developments with dwellings that are below the specific requirements of the national standard. Given the population profile, nature of existing housing stock and low levels of new development that currently meet the standards (specifically in relation to one, two and three bedroom properties where there is the greatest need), coupled with the high need for two and three bedroom properties, there is clear justification to require all new properties to at least meet, or exceed, the prescribed minimum national space standards.

In considering this in **proposals**, it is important also to consider that small houses can also contribute to meeting some need. There is the potential for such houses to be more affordable, use less amounts of building material and require less land. In some locations in North Norfolk, it may also be that smaller homes are more consistent with the prevailing historic character of the area. These considerations need to be balanced against the practical benefits of the **minimum** standard size homes with adequate internal space built for modern needs across all tenures **and the prevailing landscape / historic character and in line with associated policies in this Plan**

Planning applications often detail a variety of types of dwellings and information on how a proposal in general, and also each unit type, seeks to meet the new minimum space standards will need to be provided at the planning application stage in a tabulated format for each house design. The submission of such information will form part of the validation process. The new standards will be applied through planning conditions at the time of approval. Compliance will be through planning enforcement.

Planning applications are required to include sufficient detail in submitted documentation to allow determination of compliance for each housing type proposed **as a validation requirement**. This should be in detailed **tabulated form against each technical requirement** and not left to the interrogation of designs and drawings. A separate statement and or inclusive section in any Design and Access statement is ~~supported~~ **required**.

The Government's national space standards as the minimum acceptable space standards ~~should~~ **will** be applied to both open market and affordable housing within North Norfolk.

### **Policy HOU 9: Minimum Space Standards**

All new dwellings **and conversions**, ~~must be designed and constructed in a way that enables them shall to meet~~ **comply with** or exceed the Government's Technical Housing Standards- Nationally described Space Standards, or successor document <sup>7</sup>

All **residential** development proposals ~~at application stage should~~ **will** be accompanied by a separate document ~~setting out~~ **set out** how proposals, including for each dwelling type, accord comply with, **or exceed** the **minimum standards as set out in the technical requirements** <sup>8</sup> **in the Design and Access statement or equivalent separate statement** ~~set out below~~. As a minimum this should detail:

- ~~1. the gross internal floor area.~~
- ~~2. the extent of built in storage, sqm.~~
- ~~3. the number of single, twin /double bedrooms with minimum widths.~~

<sup>7</sup> Or any subsequent national equivalent standard should the Building Regulations and or national policy be reviewed in the future.

<sup>8</sup> Technical housing standards- Nationally Described Space Standard. DCLG, March as in **appendix XX** to this local plan or successor document.

4. the minimum floor to ceiling height for at least 75% of the gross internal area.

## Appendix xx

The following are the current standards which would need to be achieved in order to comply with policy HOU9.

### Technical Requirements

- a. the dwelling provides at least the gross internal floor area and built-in storage area (set out in Table 15);
- b. a dwelling with two or more bedspaces has at least one double (or twin) bedroom;
- c. in order to provide one bedspace, a single bedroom has a floor area of at least 7.5m<sup>2</sup> and is at least 2.15m wide;
- d. in order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5m<sup>2</sup>;
- e. one double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide;
- f. any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1m<sup>2</sup> within the Gross Internal Area);
- g. any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all;
- h. a built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72m<sup>2</sup> in a double bedroom and 0.36m<sup>2</sup> in a single bedroom counts towards the built-in storage requirement;
- i. the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Internal Area.

### Minimum Gross Internal Floor Area & Storage, msq

Number of Bedrooms	Number of bed spaces(persons)	1 story dwellings	2 story dwellings	3 story dwellings	Built in storage
1b	1p	39(37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

### 3 - HOU10: Water Efficiency

#### Updated Reasoned Justification

This policy requires developments to meet the higher Building Regulations optional water use standard of 110 litres/person/day, (lpppd), as set out in Building Regulations, Part G2 2016. **or any higher standard subsequently set nationally or locally**

North Norfolk, like many parts of Norfolk and wider East Anglia, experiences low levels of rainfall and is defined by the Environment Agency as an area of water stress. At the same time the District contains internationally important water based environmentally protected sites. Anglian Water ~~River Basin District Management Plan 2015~~ seeks the continuation of demand management and water efficiency techniques through Local Plan policies requiring new homes to meet **or exceed** the tighter water efficiency standard of 110 litres per person per day as described the current Building Regulations.

In an area of serious water stress, incorporating water demand management into **dwelling development** from the start promotes water efficiency and resilience, along with the protection of water quality and protection of areas of environmental importance within and adjacent to North Norfolk.

**For non-residential development and in line with the local and national drive for good progressive water management sustainable water use and operation of buildings is required through compliance with BBREEAM “Very Good” water efficient standard.**

**Water reuse and recycling and rainwater and storm water harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply. Projects are expected to aspire beyond these ratings where possible to do so. Applications should include sufficient detail as to intended standard and set out the measures to be incorporated to enable compliance.**

~~9.65 All new homes have to meet the mandatory national Standard set out in **Part G2** Building Regulations of 125 litres per person per day. The NPPF states that Local Planning Authorities should adopt proactive strategies to mitigate and adapt to climate change, including taking account of water supply. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts. The Planning Practice Guidance states that, where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.~~

~~9.66 North Norfolk, like many parts of Norfolk and wider East Anglia, experiences low levels of rainfall and is defined by the Environment Agency as an area of water stress. At the same time the District contains internationally important water based environmentally protected sites. The Anglian River Basin District Management Plan 2015 seeks the continuation of demand management and water efficiency techniques through Local Plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day as described the Building Regulations.~~

~~9.67 The Norfolk Authorities, in conjunction with Natural England, Environment Agency and Anglian Water, recognises that Plans should contribute to long term water resilience. Through the Norfolk Strategic Planning Framework and Duty to Cooperate process there is an agreement to seek to introduce the optional higher water efficiency standards across all authorities in the County. In~~

parallel, Anglian Water are introducing a number of water efficiency incentives(76) for housebuilders and are offering a financial incentive to developers in order to build more sustainable homes including a reduction in the standard fixed element of the Zonal Charge per plot where homes are built to a water efficiency standard of 100 lpppd.

9.68 Viability of development is not affected by water efficiency requirements. The cost per dwelling of implementing the higher Building Regulations water efficiency standard of 110 lpppd and BREEAM is marginal, with the Governments own assessment putting the cost at around £10 per dwelling and BREEAM compliance between 0.1 and 0.2%. The draft North Norfolk Viability Assessment has shown that such a low additional cost will have no impact on development viability.

9.69 Compliance will be required through **planning condition** and the Building Regulations process for residential and condition for BREEAM certification for non-residential.

#### **Policy HOU 10:Water Efficiency**

All new development must be designed and constructed in a way that minimises its impact on water resources.

- All new dwellings, including building conversions, must be designed and constructed in a way that enables them to meet or exceed **the Government's Building Regulations Part G, amended 2016 water efficiency higher optional standard requirement of 110 litres water use per person per day(77), or any higher standard subsequently established nationally or locally.**
- **Non-housing development will meet the BREEAM "Very Good" water efficiency standard, or equivalent successor.**

**Projects are expected to aspire beyond these ratings where possible to do so. Applications should include sufficient detail as to intended standard and set out the measures to be incorporated to enable compliance.**

#### **4 - Policy HOU11: Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction**

LP text (Regulation 18)

**The purpose of this policy** is to promote a proactive strategy to mitigate and adapt to climate change and to move towards a low carbon future in building construction.

**9.70** This policy sets out the strategic approach by which the Council will support the achievement of progressively increased standards of sustainability (including reduced carbon footprint for new development required by national planning and energy policy), through the granting of planning permission.

**9.71** The importance of good design and the Government's intent to move towards a low carbon economy is clearly detailed in Section 14 of the NPPF and the Government's Clean Growth Strategy. The UK is a signatory to the United Nations Framework Convention on Climate Change (UNFCCC), Paris Agreement (2016) and through this and the Climate Change Act 2008, the UK is committed to reduce greenhouse gas emissions by 57%, compared to 1990 levels by 2032, and at least 80% by 2050. A 36% reduction in UK emissions is required from 2016 to 2030, with approximately a 20% cut in emissions (89 MtCO<sub>2</sub>e) required from the buildings sector as a whole.

**9.72** Providing sustainable development and meeting the accommodation needs of existing and future residents is a key aim of the Council, with strategic objectives seeking to; encourage high quality, sustainable, and climate change resilient design which makes the best use of improvements in technology; minimise the demand for resources and mitigating the impacts arising from climate change.

**9.73** The NPPF states that the planning system should support the transition to a low carbon future and when setting local requirements for a building's sustainability, Local Authorities should do so in a way consistent with the Government's nationally prescribed standards. There is not a national technical standard for carbon reduction in the same way that there are technical standards for space, water and accessibility. However Section 19 of the Planning and Compulsory Purchase Act (2004), Section 182 of the Planning Act (2008), the Planning and Energy Act (2008), and Section 14 of the NPPF puts a positive emphasis and a legal duty on local planning authorities to introduce policies which reduce carbon emissions from new homes. Page 188 of the Government's Clean Growth Strategy specifically highlights the role of LPA's:

*Moving to a productive low carbon economy cannot be achieved by central government alone; it is a shared responsibility across the country. Local areas are best placed to drive emission reductions through their unique position of managing policy on land, buildings, water, waste and transport. They can embed low carbon measures in strategic plans across areas such as health and social care, transport, and housing.*

Under the 2008 Planning and Energy Act LPAs may require development in their area to comply with energy efficiency standards that exceed the energy requirements of Building Regulations. In accordance with the provisions of the March 2015 Ministerial Statement, WMS, the Council will expect new build residential development to achieve a 19% improvement in energy efficiency over the 2013 Target Emission Rate. This is equivalent to meeting the energy requirements of level 4 of the withdrawn Code for Sustainable Homes as detailed in the WMS.

**9.75** The policy approach is based on a recognised national code and provides some flexibility in circumstances where it can be demonstrated that achieving the required standard for the type and scale of development in question would either be not feasible or not viable in the light of such considerations as site constraints, other planning requirements, other development costs, and the prevailing market conditions at the time. In such circumstances, the Council may agree to lower energy efficiency standards being achieved, having regard to other merits of the scheme in terms of sustainability and urban design. Development will still need to meet the requirements of the Building Regulations in force at the time.

**9.76** Information on how a proposal seeks to meet the new standards will need to be provided upfront at the planning application stage through a sustainability statement. The submission will form part of the validation process. The new standards will be applied through planning conditions applied through planning conditions attached to any permission granted.

**9.77** Developments should follow the principles of design set out in the energy hierarchy by prioritising the requirement to eliminate energy need through measures such as design and scheme layout, the use of thermally efficient construction methods and materials and make optimal use of passive heating and cooling systems. Step 2 would be to minimise energy usage by incorporating energy efficient systems, equipment and appliances. Step 3—supply energy from renewable and low carbon sources and as a final step remaining emissions could be offset.

### Updated Reasoned Justification

**The purpose of this policy** is to promote a proactive strategy to mitigate and adapt to climate change through moving towards a low carbon future in building construction.

The Governments' Clean Growth Strategy 2017 specifically highlights the role of Local Planning Authorities through local leadership in moving to a productive low carbon economy. The NPPF along with the section 182 of the Planning Act 2008, the Planning and Energy Act 2008 puts a positive emphases and a legal duty on local authorities to include policies on climate change mitigation and adaption in Development Plan Documents. The Climate Change Act passed in 2008 committed the UK to reducing greenhouse gas emissions by at least 80% by 2050 when compared to 1990 levels. **In 2019 The Government introduced a legally binding**<sup>9</sup> target to reduce greenhouse gas emissions to net zero by 2050 – making the UK the first major economy in the world to legislate a zero net emissions target. The Governments publication of its response to the Future Homes Standard<sup>10</sup> reinforces its intent on moving to a carbon zero (ready) environment and clearly sets out the direction of travel for the development industry and the importance of minimum energy efficiency standards for buildings in order to archive the decarbonisation of buildings and achieve the net zero target.

Local authorities are required to adopt proactive strategies to reduce consumption of fossil fuel, mitigate climate changes and adapt to its effect. The design and construction of buildings can directly affect the environment in terms of energy use and subsequent generation of greenhouse gases, as well as natural resources. The policy measures to reduce the consumption of energy and natural resources is aligned to the direction of travel of national policy through the use of a progressive fabric first approach alongside the use of low carbon heating systems and low carbon technology.

The ambition of the approach is that energy efficient, low carbon homes will become the norm in new build developments in North Norfolk. By making our new homes and other buildings more energy efficient and embracing smart and low carbon technologies, we can improve the energy efficiency of peoples' homes, potentially boost economic growth, help in the reduction of carbon emissions and be more cost effective in long term management and day to day running costs in the housing sector.

The Council expects all new developments to apply the energy hierarchy by reducing the need for energy, use energy efficiently, supply energy efficiently and use low and zero carbon technologies and natural resources and go beyond current building regulations. Developers are free to vary specifications to meet the policy target through fabric improvements, design and or technology provided the overall carbon reduction is achieved or bettered. A **Compliance Statement** is required **as a validation requirement** setting out the level of reduction in carbon and how the proposal will achieve the energy performance and carbon reduction in relation to the Target Emission Rate of the 2013 Edition of the 2010 Building Regulations (Part L) (amended 2016)

In line with national and local drive for progressive energy efficiency the policy ambition is to drive sustainability standards across all types of development and as such, in line with the promotion of assessment framework and design review tools promoted through para 129 of the NPPF the policy approach is to utilise BREEAM very good standard for non-residential development.

BREEAM is an environmental assessment method that assesses the environmental performance

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<sup>9</sup> <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

<sup>10</sup> <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings> January 2021

of non-residential buildings across ten categories with minimum standards being required in key areas such as energy, water and waste. The 500sqm threshold is intended to avoid imposing the requirement on modest structures.

The NPPF requires a positive approach to promoting energy efficiency and in doing so the Policy approach lays the foundations for the Governments Future Homes Standards currently anticipated to be introduced in a progressive way between 2022 and 2025. The Standard is expected to set out measures and time scales to achieve further reductions in carbon of between 75-80%. This would typically mean that a new home built to the Future Homes Standard would have a heat pump, a waste water heat recovery system, triple glazing and minimum standards for walls, floors and roofs that significantly limit any heat loss set through building regulation and outside the planning framework. The Government has indicate that it is intending to consult on the full technical details and building regulation requirements in 2023.

As such it is acknowledged that the policy approach will be potentially replaced once building regulations are strengthen and in place through the Future Homes Standard. In setting an incremental policy requirement for carbon reduction now, the approach recognises that the drive to zero carbon, environmental and social improvements should start as soon as practical and over time but at a level where the base line requirements are technically possible, available, and economically viable.

In promoting energy efficiency the policy is aiding the creation of the step change required in construction technics and energy efficiency of dwellings ahead of the governments intended Future Homes Standard legislation and is in line with the wider Council ambition. It signals that promoters and developers in North Norfolk need to invest in supply chains, upskill, update designs and incorporate mitigation and adaptation measures and technology in order to support the delivery of the lowest levels of carbon emissions in order to start to reduce the future proportion of emissions from the building sector and decarbonise new dwelling across North Norfolk from the start of the Local Plan.

Compliance will be required through planning conditions including BREEAM certification for non-residential ([Link to design policy](#))

Technology and national policy is changing rapidly in this area and the approach will be supported by Supplementary Planning Guidance and if required further implementation note.

#### **Policy HOU 11: Sustainable Construction, Energy Efficiency & Carbon Reduction**

New development is required to achieve a high standard of environmental sustainability.

1. New build residential development ~~should~~**will** achieve reductions in CO2 emissions of a **minimum 31%** ~~19%~~ below the Target Emission Rate of the 2013 Edition Building Regulation, **(amended 2016)** ~~of the 2010 Building Regulations (Part L)~~ unless superseded by national policy or legislation; This should be achieved through:
  - a. the implementation of the energy hierarchy; prioritising the use of design and energy efficient measures followed by the provision of appropriate renewable and low carbon energy technologies ~~and where it can clearly be shown that this is not possible, offsite offsetting measures;~~



b. incorporation of measures to maximise opportunities for solar gain through building orientation, to maximise natural ventilation, use of green roofs, ~~and~~ natural shading, **and other appropriate measures.**

**c. the use of locally sourced natural resources**

2. All development proposals should be accompanied by a separate **compliance statement Sustainability Statement** setting out how the proposals will seek to:

~~a. address climate change mitigation and adaption;~~

~~b. deliver the lowest level of carbon emissions (direct and embodied);~~

~~c. take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption;~~

**a. the approach taken to address energy efficiency within the design and technical specification of the proposed development;**

**b. comparative energy performance and carbon emission rates of the proposal in relation to the benchmarked TER.**

The above standards should be achieved as a minimum unless, it can be clearly demonstrated that this is either not technically feasible or ~~not~~ viable.

Proposals for non-residential development will be supported to achieve a minimum of ~~Breem~~ **BREEAM Very Good** Standard or equivalent.

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## Local Plan Draft Policy Approaches to Sustainable Development

**Summary:** This report considers the representations made at Regulation 18 stage of plan preparation and seeks to endorse a number of policy approaches concerning matters of sustainable development.

**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:**

**SD13: Pollution & Hazard Prevention and Minimisation;**  
**SD14: Transport Impact of New Development;**  
**SD15: Parking Provision;**  
**SD16: Electric Vehicle Charging;**  
**SD17: Safeguarding Land for Sustainable Transport.**

Cabinet Member(s)	Ward(s) affected
All Members	All Wards
Contact Officer, telephone number and email:	
Caroline Dodden, Senior Planning Officer, 01263 516310 <a href="mailto:Caroline.dodden@north-norfolk.gov.uk">Caroline.dodden@north-norfolk.gov.uk</a>	
Iain Withington, Planning Policy Team Leader, 01263 516034 <a href="mailto:Iain.Withington@north-norfolk.gov.uk">Iain.Withington@north-norfolk.gov.uk</a>	

### 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 wider principle of sustainable development with regard to future Plan-making ahead of Regulation 19 consultation and the submission of the Plan.

## **2. Background and Update**

- 2.1 These policies will form part of the wider suite of policies within the sustainable development section of the emerging Local Plan. At Regulation 18 stage each of the policies, apart from Policy SD 16 regarding Electric Vehicle Charging, were similar versions of existing policies as those currently used within the current Core Strategy (Policies EN13, CT5, CT6 and CT7 respectively). As part of the review of these policies, it has not only been necessary to take account of consultation feedback, but also to ensure that the emerging policies align with national guidance contained within the National Planning Policy Framework (NPPF) and national Planning Practice Guidance (PPG).
- 2.2 The purpose of Policy SD13 is to minimise and reduce all emissions and other forms of pollution, including air, noise and light pollution and to ensure no deterioration in water quality.
- 2.3 The purpose of Policy SD14 is to ensure that the public highway remains safe and convenient to use for all road users.
- 2.4 The purpose of Policy SD15 is to ensure the provision of adequate car and cycle parking within development sites.
- 2.5 The purpose of Policy SD16 is to promote and ensure the delivery of appropriate electric vehicle charging infrastructure and to future-proof new developments in the District.
- 2.6 The purpose of Policy SD17 is to safeguard land for sustainable transport related uses.

## **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 relevant issues. The comments are summarised below for each draft policy:

### Policy SD13: Pollution & Hazard Prevention and Minimisation

- 3.2 **Individuals:** Two responses in support were received, which commented that it was important to minimise noise and light pollution. Suggesting that noise and light control zones should be introduced in rural areas and that all development proposals should provide an Environmental Impact Assessment (EIA).
- 3.3 **Parish & Town Councils:** One general comment received from Cley PC, requesting a more robust and enforceable policy relating to the reduction in

light pollution and requesting more areas to be designated as dark sky discovery sites.

- 3.4 **Statutory Bodies and Organisations:** Four general comments and two responses in support were received. The feedback was generally supportive of the approach. However, comments sought that more emphasis should be given to air quality, dark skies and further details provided around the Water Framework Directive and that the Habitats Directive is referred to, particularly given the close proximity to the Broads. One response suggested that more prescription and guidance should be provided about how the policy would be implemented and quantified.

Policy SD14: Transport Impact of New Development

- 3.5 **Individuals:** Three general comments, one of support and four objections have been received, covering a wide range of matters. There are concerns over the adequacy of the road infrastructure to deal with cars resulting from new development and the impact of increased traffic across the District. Some suggest that Travel Plans should be required for large residential schemes and one comments that restricting direct access onto a Principal Route is in contradiction with Paragraph 109 of the NPPF and cannot be justified. One comments that the Policy does not mention County Council transport policies or park and ride schemes to minimise car use in town centres. Specific concerns have been raised over the suitability of the existing road network in and around Southrepps to accommodate more growth. One comment suggests the provision of new green cycling paths away from roads. Another comments of the need to assess levels of commuting to ensure that the wider road infrastructure is not overloaded and minimises greenhouse gases. Suggested changes to the policy include that all development has significant transport implications that should require a transport assessment.
- 3.6 **Parish & Town Councils:** Two general comments were received. Sheringham TC comments that A149 should be included as a Principal Route on the Policies Maps, because funding for buses only has to cover Principal Routes. Wells TC expressed concern about the dwindling level of public transport, which has an impact on the ability of people to access work and education. In addition, there has been an increase in visitor parking in the town, which highlights the need to implement parking restrictions and other traffic management.
- 3.7 **Statutory Bodies & Other Organisations:** One objection, one general comment and three responses of support. Feedback was supportive of the approach and general principles, however, comments suggested more emphasis be given around how the impacts of air quality could be addressed through this policy. Criteria 4 was objected to as onerous and above that required through national policy. Further consideration of Paragraph 104 of the NPPF which promotes high quality walking and cycle parking and the recognition of other forms of transport network was promoted.

Policy SD15: Parking Provision

- 3.8 **Individuals:** Two objections, three general comments and one response of support were received. The representations call for increased levels of car and cycle parking within residential developments and that the policy should ensure that public parking is adequate, well designed and includes blue

badge parking. Concern highlights safety issues relating to cars parking on narrow roads and access roads and reflect the different reliance on cars between urban and rural areas.

- 3.9 **Parish & Town Councils:** one general comment from Sheringham TC supports the retention of designated public car parks and refers to a particular site in Sheringham, where this would be particularly poignant.
- 3.10 **Statutory Bodies & Other Organisations:** Two responses of support, where one mentions the need to mitigate against any potential impacts from external lighting and signage in car parks. The other supports the flexibility of the policy, stating that each development site has individual characteristics regarding connectivity and local sustainable transport opportunities.

#### Policy SD16: Electric Vehicle Charging

- 3.11 **Individuals:** Five general comments and two of support were received. There is overall support for the provision of electric charging points, but concerns with how this will be delivered. It is suggested that the wording is changed to remove the phrase 'where practical' from the first line of the policy.
- 3.12 **Parish & Town Councils:** One objection from North Walsham TC, which supports the provision of charging points in domestic driveways, but comments that this should be extended to communal parking areas as well, with active, rather than passive, charging points.
- 3.13 **Statutory Bodies & Other Organisations:** Four general comments and four in support were received. Overall, the responses were generally supportive of the inclusion of electric vehicle (EV) charging points as part of new residential development proposals, where the policy lends itself to levels of EV parking provision that is proportionate and practical in respect of both delivery, technically and practical and management. Some responses raised concerns about the potential costs associated with the required infrastructure around existing locations and expansion of parking and sought clarity on the levels of any in lieu payment allowed. Housing developers confirmed willingness to support the approach, (much of which is in the general direction of national policy) especially where private garages are concerned but raised delivery and maintenance issues around communal parking areas and suggested that further thought needs to be given in the finalisation of the policy to the issue of active/passive provision, and to the subsequent management/payment processes (avoiding superfluous/onerous expectations on the developer post provision).

#### Policy SD17: Safeguarding Land for Sustainable Transport

- 3.14 **Individuals:** Two objections and one of support were received. The objection would like to see the rail link to Fakenham and Holt included and Hoveton added to the policy list where land will be safeguarded for Sustainable Transport use.
- 3.15 **Parish & Town Councils:** No comments received.
- 3.16 **Statutory Bodies & Other Organisations:** Two comments of support received. The safeguarding of sustainable transport routes was supported highlighting the potential for footpaths and Green infrastructure. The addition

of Wells next the Sea and in particular land at Wells & Walsingham railway was put forward for consideration as a further location to protect.

#### **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:

#### **4.2 NPPF paragraphs:**

**102.** Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

**103.** The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

**104.** Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- d) provide for high quality walking and cycling networks and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

e) provide for any large scale transport facilities that need to be located in the area, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy.

**105.** If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

**108.** In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

**109.** Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

**110.** Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

**111.** All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.



**170.** Planning policies and decisions should contribute to and enhance the natural and local environment by:

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.

**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 life<sup>60</sup>;

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.

**181.** Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

#### 4.3 PPG

There is relevant guidance within the PPG regarding:

- Air Quality (including para: 006 Reference ID: 32-006-20191101);
- Water Quality (including para: 006 Reference ID: 34-006-20161116);
- Light Pollution (including para: 002 Reference ID: 31-002-20191101);
- Noise (including para: 003 Reference ID: 30-003-20190722);
- Land affected by contamination (including para: 006 Reference ID: 33-006-20190722);
- Travel Plans, Transport Assessments and Transport Statements (including para: 007 Reference ID: 42-007-20140306);
- Climate Change (including para: 003 Reference ID: 6-003-20140612).

## **5. Conclusions for Policy SD13: Pollution & Hazard Prevention and Minimisation**

- 5.1 The feedback was generally supportive where comments are generally focused around the need for more emphasis on the matters of water quality, noise pollution and light pollution. For increased clarity, the policy justification text has been altered to provide separate sections on the topics that the policy covers and the amount of information expanded to take account of the consultation comments. In addition, the policy has been updated in line with the requirements of the NPPF (in particular, paragraphs 170, 180, 181) and guidance within the PPG.
- 5.2 Clarity has been brought by removing the words 'where possible' and by setting out at the head of the policy the fundamental aim to protect the environment, by avoiding, minimising and taking every opportunity to reduce through mitigation measures, of all forms of pollution. The matters that the policy covers have been extended to specifically refer to noise and light pollution. It should be noted that these matters are also included in other emerging policies, such as, ENV10: Protection of Amenity. In order to reinforce the issue of light pollution, this policy also incorporates specific wording regarding the importance of dark skies and tranquillity as intrinsic characteristics of the North Norfolk Coast AONB, wider rural areas of the district including neighbouring Authorities. In addition, it is useful to reiterate the intention to cover design matters relating to light pollution in the next version of the North Norfolk Design Guide SPD.
- 5.3 In response to the comment requesting EIAs for every development, it should be noted that the EIA is a process that evaluates the likely environmental impacts of a proposed project or development. The screening provisions including thresholds are set out in the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.
- 5.4 It is concluded that the policy wording be amended as set out in Appendix 2.

## **6. Conclusions for Policy SD14: Transport Impact of New Development**

- 6.1 In response to the feedback and in order to align the policy with national guidance, it is considered that there is scope to undertake some minor changes and clarifications, in particular to criteria points 4 and 5. This should also ensure any ambiguity is removed and strengthen the policy wording. The introduction and policy justification text has been expanded to highlight the need to maximise sustainable transport opportunities, particularly with regard to the wider need to reduce emissions and improve air quality and public health. Specific reference is also made to the County Council's 3<sup>rd</sup> Local Transport Plan, Connecting Norfolk, which sets out the strategic policy for transport in the County. In addition, further clarity has been added with regards to the need for Travel Plans, Travel Assessments and Travel Statements.
- 6.2 Some feedback conveys concerns over the adequacy of the road infrastructure to deal with cars resulting from new development, particularly in relation to villages and also the cumulative impact of increased traffic across the District. This concern reaffirms the Local Plan's strategic aim to direct the majority of new development in the district close to towns and larger villages, as set out in Policy SD3: Settlement Hierarchy. It is useful to be reminded that the wording to Policy SD3 was amended through the Working Party, to include requiring proposals for small villages to incorporate service/

infrastructure improvements to address existing constraints and also bring about additional improvements.

- 6.3 One response comments that the A149 'Coast Road' should be included as a Principal Route, as these routes obtain public transport funding. In response, it is useful to qualify that the road hierarchy comes under the jurisdiction of the County Council and that it is those routes identified as primary and principal roads that make up the roads referred to as Principal Routes in the policy. These roads have a strategic role to play in carrying traffic, usually at speed. Development in the vicinity of these roads or their junctions can compromise the ability for people to travel more sustainably whilst also prejudicing the ability of strategic routes to carry traffic freely and safely. For these reasons the Principal Routes are also designated as 'Corridors of Movement' (CoM), where development is normally resisted. Although the Coast Road (between Cromer and Hunstanton) is classified as an 'A' road, it is identified as a Special Access Route in the hierarchy, as the road travels through residential and other built up areas, which have 20 or 30 mph speed limits and often high levels of pedestrian activity with some crossing facilities including zebra crossings. As such, the Principal Routes terminology is considered to correctly reflect the County's road hierarchy and the need to safeguard highway safety on these particular roads.
- 6.4 Two comments are concerned that criteria 4 of the draft policy would be in conflict with paragraph 109 of the NPPF, in that the criteria includes consideration of any detriment to the amenity or character of the surrounding area. This element of the criteria relates to the need for a proposal to be able to successfully accommodate the expected nature and volume of traffic without being detrimental to the amenity or character of an area. Firstly, the policy is worded in a flexible way as each criteria is set out as a consideration. In addition, any assessment against this part of criteria 4, would not be a highway based assessment, but an amenity based one and therefore, it is not considered to be in conflict with paragraph 109 of the NPPF.
- 6.5 Natural England has suggested that the policy should include wording concerning the traffic impacts associated with new development in relation to the natural environment, particularly with regard to impacts on European sites and SSSIs. This matter will be picked up through the final iteration of the HRA and if necessary, the Policy will be updated accordingly.
- 6.6 It is concluded that the policy wording be amended as set out in Appendix 2.

## **7. Conclusions for Policy SD15: Parking Provision**

- 7.1 The consultation feedback generally supports the policy, with one comment being in favour of the flexibility of the policy, stating that each development site has individual characteristics regarding connectivity and local sustainable transport opportunities. Some representations call for increased levels of car and cycle parking within residential developments and that the policy should ensure that public parking is adequate, well designed and includes blue badge parking.
- 7.2 Minor amendments have been made to the policy wording to clarify the need for 'on-site vehicle and cycle parking. Reference is made to the County Council's latest parking standards, as the current version dates from 2007 and are likely to be updated during the lifetime of the Plan. The policy is worded to allow for the parking standards to be used as a starting point and

for the individual accessibility circumstances of any development site to steer the final level of parking provision.

- 7.3 It is concluded that the policy wording is amended as set out in Appendix 2.

## **8. Conclusions for Policy SD16: Electric Vehicle Charging**

8.1 Consultation feedback to the policy was generally supportive of the inclusion of electric vehicle (EV) charging points as part of new development proposals, highlighting that the policy must be flexible in determining levels of EV parking provision that are both proportionate and practical in respect of their delivery, technical feasibility, as well as their management. The provision for new communal parking in residential development has been changed to provide a minimum of 50% of the car parking spaces with active chargepoints, as suggested by North Walsham Town Council, with the remainder of the spaces needing passive provision.

8.2 There is the potential that the next version of the County Council Parking Standards will incorporate required levels of EV charging points for different types of development. Any such future standards are likely to be a material consideration and consequently, any relevant development schemes will need to accord with either these standards or the details set out in this draft policy, whichever provides the greater level of EV chargepoint provision.

8.3 Given the above, it is considered important to provide this policy in order to take a proactive approach to the development with regards to positively meeting local, national and international climate change challenges. The policy wording has, therefore, been strengthened to ensure that EV chargepoint provision is delivered. Given the rapid change in technology and variations in provision, it is likely that Supplementary Planning Guidance will be needed to offer further information on this matter.

- 8.4 It is concluded that the policy wording is amended as set out in Appendix 2.

## **9. Conclusions for Policy SD17: Safeguarding Land for Sustainable Transport**

9.1 This strategic policy directly relates to the requirement within the NPPF (part (e) of para. 104) to identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.

9.2 Limited feedback comments were received regarding this policy. The safeguarding of sustainable transport routes was supported highlighting the potential for footpaths and Green infrastructure. The addition of Wells next the Sea and in particular land at Wells & Walsingham railway was put forward for consideration as a further location to protect. In addition, a request was put forward for the inclusion of land associated with a rail link project between Fakenham and Holt and also land at Hoveton.

9.3 The identification of safeguarded land for sustainable transport falls under the jurisdiction of the County Council Highway Authority and the current locations listed have been carried forward from the existing Core Strategy Policy CT 7.

To date, the County Council has confirmed that the Norfolk Rail Freight Strategy is no longer a relevant document. The County Council is drafting a replacement Norfolk Rail Prospectus, along with developing a 'recycling the railways' project, which looks to create longer distance cycle paths along some of the closed rail lines. Further detail is expected from the County in due course in order to update the emerging policy going forward.

- 9.4 It is concluded to further update the policy wording as set out in Appendix 2, based on further County Council input.

## **10. Recommendations**

- 10.1 **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:**

**SD13: Pollution & Hazard Prevention and Minimisation;  
SD14: Transport Impact of New Development;  
SD15: Parking Provision;  
SD16: Electric Vehicle Charging;  
SD17: Safeguarding Land for Sustainable Transport.**

## **11. Legal Implications and Risks**

- 11.1 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.
- 11.2 The statutory process requires records of consultation feedback and a demonstration of how this has informed plan making with further commentary demonstrating how the representation at regulation 18 have been taken into account in line with Regulation 22.

## **12. Financial Implications and Risks**

- 12.1 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

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## 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 SD13 - Pollution & Hazard Prevention and Minimisation

#### (Regulation 18 Reponses)

##### Individuals

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

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



## Parish & Town Councils

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

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

## Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD13	Anglian Water (1217129)	LP353	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Anglian Water is generally supportive of Policy SD13. It is suggested that applicants should also demonstrate that development proposals would not be adversely affected by the normal operation of Anglian Water's	Noted: Consider feedback in the development of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				existing assets. Proposed amendments include adding new section: Proposals for development adjacent to, or in the vicinity of, existing uses will need to demonstrate that both the ongoing use of the neighbouring site is not compromised, and that the amenity of occupiers of the new development will be satisfactory with the ongoing normal use of the neighbouring site, taking account of the criteria above'	It should be noted that this point has been picked up in Policy ENV10: Protection of Amenity.
SD13	Broads Authority (321326)	LP806	General Comments	7.101 and 7.102 and SD13 – parts of NNDC area in the Broads are good or very good dark skies as referred to in DM22 of our Local Plan and shown at Appendix I of our Local Plan . Please mention this in these sections of the Local Plan. What happens outside the Broads can affect the Broads as per 8.10. • I have not seen mention of the Horning Knackers Wood Water Recycling Centre capacity issue or mention of the Joint Position Statement.	Noted: Consider feedback in future iteration of the Plan
SD13	Environment Agency (1217223)	LP457,458	General Comments	Paragraph 7.99 It is worth noting that air quality requirements are likely to become stricter within the window of this plan and restrictions on particulate matter and NOx may need reviewing in light of those changes. It would be useful to include reference to the fact that air quality is important to the Environment and Human Health and will therefore be reviewed against any changing guidelines. Paragraph 7.100 We are pleased to see the inclusion of reference to the Water Framework Directive (WFD) here. The wording should also state that developments impacting the water environment must carry out a WFD compliance assessment in accordance with the Planning Inspectorates advice note 18. The section on WFD would also benefit from some expansion. Two requirements of WFD are that the development should not cause a deterioration and should not prevent the future 'good' target status from being achievable. The local plan needs to consider this and provide	Noted: Consider comments in the future iteration of the Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>evidence that the developments within the growth areas and their associated increase in wastewater flows from WRCs will not cause a deterioration the receiving rivers or waterbodies. It would be useful for the local plan to include relevant River Basin Management Plan (RBMP) 2 baseline WFD status for these North Norfolk waterbodies to be highlighted to provide context (for example, overall ecological status, fish, water quality determinants). It is important that growth and development does not cause a deterioration in these individual statuses. We would also expect to see the Habitats Directive mentioned here as this directive is especially important for North Norfolk with the close proximity of the Broads and associated sensitive SSSIs/SACs. In terms of industrial activity – it should be ensured that industrial development within an area takes into account the need to be sustainable. Any location must allow the industrial activity to be sustainable so that material flows can make the plant as efficient as possible. Where possible, the plan should encourage the use of energy efficient technology such as Combined Heat and Power (CHP) at energy intensive industries so that efficient use of fossil fuel is optimised. Wastes in the form of effluent and process wastes should be recovered into the circular economy and where possible any treatment facility should be co-located, or at least situated nearby, to minimise transport impacts of moving wastes around the country. • Policy SD 13 – Pollution &amp; Hazard Prevention and Minimisation We are pleased to see reference to water quality within the policy. The policy should also reference the WFD and the habitats directive. Specifically, the 2 two objectives of WFD, no deterioration and improvement in status should be referenced. In relation to Major Hazard Zones, we will be asked to comment on any inappropriate development highlighted in partnership Health &amp; Executive</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				as part of our role as competent authority enforcing the CoMAH Regulations.	
SD13	Norfolk Coast Partnership, Ms Gemma Clark  (1217409)	LP497	General Comments	<p>7.102 – We would like to see standard conditions on all applications where external light is proposed. National Planning Policy Framework Clause 125 and Norfolk County Council’s Environmental Lighting Zones Policy both recognise the importance of preserving dark landscapes and dark skies. In order to minimise light pollution, we recommend that any outdoor lights associated with proposed development should be: 1) fully shielded (enclosed in full cut-off flat glass fitments) 2) directed downwards (mounted horizontally to the ground and not tilted upwards) 3) switched on only when needed (no dusk to dawn lamps) 4) white light low-energy lamps (LED, metal halide or fluorescent) and not orange or pink sodium sources Please also refer to the Institute of Lighting Professionals, Guidance Notes for the Reduction of Obtrusive Lights which gives guidance for lighting in an AONB.</p> <p><a href="https://www.theilp.org.uk/documents/obtrusive-light/">https://www.theilp.org.uk/documents/obtrusive-light/</a>  <a href="https://www.theilp.org.uk/resources/free-resources/ilp-guidance-notes/">https://www.theilp.org.uk/resources/free-resources/ilp-guidance-notes/</a>  This has been nationally tested and is used as guidance for developers to reduce impact in designated areas. Dark Sky Discovery Sites – can we please ask to be particularly vigilant regarding proposed lighting within a 2km radius of any Dark Sky Discovery Site? DSDDs are not statutory but they are a clear indication of the high quality dark skies, which is directly linked to the special qualities of the AONB. NNDC officers requested that they be put on a GIS layer so that planners are aware of them when assessing applications, please let us know if you are using them. No need to mention the specific Dark Sky Discovery sites specifically as hopefully we will be adding more sites over time.</p>	Support welcomed: Consider comments in the finalisation Plan and policy ENV10

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD13	RSPB (1217391)	LP431	General Comments	The RSPB notes that section 7.100 states "developer must strive" to meet requirements of the WFD. Water quality remains a serious issue for the Broads and other watercourses. It is important to ensure that all new development will ensure that there will be no deterioration in water quality. The policy should also ensure that new development contributes towards measures to complement action to improve water quality and make improvements. Proposed change: Remove "must strive" and state that developments will be required to WFD targets and support water quality improvements in line with net gain requirements for the environment.	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.
SD13	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP617	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Supports the need for a Pollution and Hazard Prevention and Minimisation Policy but suggests that the Council may wish to consider providing more guidance in the Policy's justification on what an unacceptable level of impact may be, i.e. the standards, targets to be applied etc.	Support noted. Consider comments in the development of the policy.

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

### Alternatives

SD13	Mr & Mrs Johnson (1215700)	AC021	Support	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b></p> <p>Supports Assessment of SD13 - Development itself causes pollution. All developments should have an environmental impact statement considered as part of the planning process. Noise in particular and effect on adjacent occupants, traffic disruption, dust and emissions, use of appropriate materials should all be considered. Noise from completed development (whether existing or new) should be rigorously controlled. The inconvenience of adjacent occupiers should be prevented. Developments that could potentially cause noise should have appropriate planning conditions attached to prevent that occurring. North Norfolk is one of the least light polluted counties in England. Long may this continue and a gradual erosion of this by inappropriate lighting schemes should be prevented. LED lighting with downward lighting only should be used. Schemes that allow uplighting and unnecessary light spillage should be rejected.</p>	<p>Comments noted: This comment repeats the support SD13 made against the First Draft Local Plan (Part 1).</p>
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## Policy SD14 - Transport Impact of New Development

### (Regulation 18 responses)

#### Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD14	Carr, Mrs Elizabeth (1216730)	LP395	General Comments	<p>creating green cycle paths that do not use the roads at all would be beneficial to locals and tourists. The narrow roads without footpaths are very dangerous for inexperienced or young cyclists. As there is not much that can be done to the width of roads without knocking down heritage buildings, creating green cycle paths would be an alternative. Perhaps use the disused railway network paths?</p> <p>Alternative transport is not an option for many residents. The roads are too narrow and busy for cyclists to use when trying to get to somewhere with facilities. Carrying shopping on the bus or cycling with it from North Walsham is not easy, so cars are an essential part of the infrastructure in a rural location. Should be greater consideration for the safety of locals and tourists who wish to use environmentally friendly means of transport.</p>
SD14	Swift, Mrs Julie (1216911)	LP243	Object	<p>As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). Add to this delivery vehicles to each property (from supermarkets, online shopping, oil deliveries etc.). Even small developments can soon add a large number of extra vehicle movements a day. Rural villages like Southrepps have largely single track roads or at best narrow roads that will allow two cars to pass but not two delivery vans/lorries. Extra vehicle movements on inadequate road networks (often with no pavements) threaten both vehicle and pedestrian safety. Looking at Southrepps any developments over 1-2 infill houses will be a departure from both SD 14 and Core Strategy Policy CT5, both of which say: Development will be designed to reduce the need to travel and to maximise the use of sustainable forms of transport appropriate to its particular location. SD 14 and CT5 say Development proposals will be considered against the following criteria:</p> <ul style="list-style-type: none"> <li>· The proposal provides for safe and convenient access on foot, cycle, public and private transport addressing the needs of all, including those with a disability;</li> <li>· the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the</li> </ul>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>locality; · the expected nature and volume of traffic generated by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety. Any development in a rural village, like Southrepps, cannot “reduce the need to travel and maximise the use of sustainable forms of transport” as there is little employment in the village, the bus service is inadequate, access to primary schools requires a car journey etc. It is not an easy area to live in without a car if you have children at school, a job, need to go shopping to a large supermarket, visit the doctors and so on. Most properties in the village have two cars or more. The recent Drurys Yard development in Southrepps containing 18 houses was given the requisite number of parking spaces seen to be applicable to the size of property. However, cars are constantly parked all down the access road as there are a lot more cars than parking spaces. Southrepps is a ‘rural’ village with working farms, both arable and livestock. Its road network comprises of mainly single-track rural lanes. Even the ‘main’ road through its centre is not capable of carrying two medium/large vans side by side. The figures on the Parish Councils website from the new SAM2 show over 60,000 vehicles a month are passing through the village (around 30,000 in each direction). The SAM2 also records that many of these vehicles are travelling in excess of 30mph. This volume of traffic has made the village roads increasingly dangerous for vehicle users, cyclists and pedestrians. Over half of the roads have no pavements or short stretches of pavement only. Elderly people, children, dog walkers, cyclists are experiencing 'near misses' on a regular basis. Every increase in traffic raises the danger levels within this village (and others like it). Developments in this village, therefore, cannot comply with the criteria above - they cannot provide for safe access; they cannot be served by safe access to the highway network without detriment to the locality; they cannot be accommodated by the existing road network without detriment to highway safety. Southrepps will see an increase in traffic with the proposed increase in development in Mundesley - as Southrepps is used as a cut through from Mundesley to the A149 and A140. This will put an intolerable strain on the road network through the village without further development in the village itself. I agree with SD 14 (and Core Strategy Policy CT5) - but at present it is being ignored by the planners.</p>



Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD14	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP256	Object	<p>The Policy states that: 'Development proposals will be considered against the following criteria: • Outside designated settlement boundaries, the proposal does not involve direct access on to a Principal Route, unless the type of development requires a Principal Route location.' However, paragraph 109 of the NPPF states that: 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' The provisions of the policy do not comply with national policy in this respect; they create an additional, more prescriptive requirement which cannot be justified and is not robust. As an example, Land East of Norwich Road would be accessed via the A140, which is a principal route. The proposed access onto the A140 lies within the 30 mph speed zone, some 150m south of the roundabout junction of the A140 and the B1436, and cars would be decelerating towards the roundabout north bound, or pulling slowly up the hill away from the roundabout in a south-bound direction. We do not therefore believe that there would be an unacceptable impact on highway safety of creating a new access here, or that the residual cumulative impacts would be severe. We assume that a robust highways assessment of each site nominated through the Call for Sites will be undertaken, and if, as set out in the NPPF, there would be no unacceptable impact on highway safety and no residual cumulative severe impact, sites should be given a positive rating as part of the site selection process, even if they are accessed from a principal route. The policy should be amended to comply with the provisions of the NPPF.</p>
SD14	Hurdle, Mr David (901803)	LP066	Object	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Point 5 under policy SD14 refers to Travel Plans for non-residential. Why not for large residential? Travel still generated! the word maximise is used about sustainable travel, in 1st sentence of SD14. So why not the word minimise when referring to car use, see my comments elsewhere? Cannot find any mention of county council transport policies, nor park and ride schemes to help minimise car use in town centres. Have I missed such references? Are you planning to consult visitors, a significant proportion of the population much of the year? If so, how? How successful has previous Local Plan been? Has it achieved the outcomes expected? Need to know when preparing this new one, i.e. lessons to learn! Travel Plans should be done for large residential developments. In 2nd bullet point of 7.20 replace 'reduce' with 'minimise'.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD14	Johnson, Mr & Mrs (1215700)	LP139	Support	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Development should take place in areas where there is access to facilities and employment in order to limit road use. The impact of additional junctions, traffic lights and roundabouts on the flow of existing traffic should be considered. There are many examples – not necessarily in Norfolk- where a large development such as a supermarket or retail park has been allowed to have a traffic light controlled junction onto a major route causing long delays in through traffic. Inconvenience for many people on a daily basis result - all so that one business can make a profit. Development should take place in areas where there is access to facilities and employment in order to limit road use.
SD14	West, Dr Louisa (1210536)	LP058	Object	The impact of more traffic due to development around the area must be considered as a whole, not just around the new development. Residents in adjacent rural areas have increasing difficulty walking due to lack of safe routes and crossing points.
SD14	Spowage, Mr Richard (1216878)	LP329	General Comments	In future development proposals there is a need to assess level of commuting outside local area to ensure wider road infrastructure is not overloaded and ensure greenhouse gases from excessive vehicle use are minimised
SD14	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> The transport criteria against which development proposals will be considered to be essential. Regard for the amenity and character of the local area is paramount, as is a provision of a comprehensive transport assessment for North Walsham as a whole. No mention of accessibility within this policy. Hope to see strengthened wording here as all larger scale development has significant transport implications and should require a transport assessment of the type specified. like to see a requirement for accessibility to both new or existing means of transport to be demonstrated as part of this process.

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

<b>Council's Response</b>	Comments noted. The primary purpose of the policy is to ensure that proposals consider safe access for all modes of access and address the transport implications of that development. Consider the suggestions of requiring Travel Plans on larger proposals in the finalisation of the policy approach.
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### Parish & Town Councils

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

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

General Comments	2	
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### Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD14	Natural England (1215824)	LP716	General Comments	<p>Transport Impact of New Development We would expect the Plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the Plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable. Natural England advises that one of the main issues which should be considered in the Plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic<sup>1</sup>, which feature habitats that are vulnerable to</p>	<p>Noted: Consider comments in the development of the policy. A reference to the detriment to European sites could be added to bullet 4. Air quality impacts have been ruled out in the Interim HRA, however it also concludes that future HRA work should continue to revisit this conclusion.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.	
SD14	Norfolk Coast Partnership, Ms Gemma Clark  (1217409)	LP498	Support	Chapter 7 – We would be happy to work in partnership and with other partners to improve opportunities and raise awareness of public transport options.	Noted: Support welcomed
SD14	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP494	Object	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Persimmon Homes Anglia support the broad objectives of Policy SD 14, but object to criterion 4 of the Policy as it would place an excessively onerous test upon new developments and would exceed the standards stipulated under paragraph 109 of the NPPF. The criterion should align with the requirements of the NPPF, which states that “development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.” As such, it is suggested that criterion 4 is revised to require avoiding 'significant' detriment to the amenity or character of the surrounding area or highway safety. In addition, Persimmon Homes (Anglia) suggest that criterion 2 should be revised in a similar way, to read as “the proposal is capable of being served by safe access to the highway network without 'significant' detriment to the amenity or character of the locality”.	Noted, disagree - consider comments in the development of the policy. For information: Policy SD14 relates to the Transport Impact of New Development, where development proposals would be assessed against 5 criterion. Point 2 states 'the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality. Point 4 states that 'the expected nature and volume of traffic generated

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					<p>by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety.' Para. 109 is quoted from the NPPF, which relates to the prevention or refusal of development on highway grounds in relation to an unacceptable impact on highway safety or the residential cumulative impacts on the road network would be severe. Para. 109 refers to an unacceptable impact and not a 'significant' impact on highway safety and therefore, it is considers that the Policy wording accords with para. 109 in this regard.</p>
SD14	Pigeon Land Ltd & JM & ID	LP618	Support	<p><b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Supports the Transport Policy's main aims and principles of increasing</p>	Support noted. Consider comments in the

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	Clifton (1217026)			<p>sustainable transport modes; and increasing travel choice. However, that the Council may wish to consider whether elements of the Policy go beyond what is expected by the NPPF without sufficient justification. The NPPF (section 109) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. The Plan's Policy as drafted would suggest that development proposals will be judged on the impact access and traffic may have on the 'amenity or character of an area', as well as highway safety and network capacity. Whilst it is accepted that they may be important considerations, it is suggested that the Council may wish to reconsider the Policy so that it is restricted to issues of highway safety and capacity of the road network, and be written in a way that, in terms of traffic impacts, development would be allowed unless there was a demonstrable adverse impact on highway safety or the residual cumulative impact on the road network is judged as severe. The written justification could usefully advise on what may be considered a severe impact in North Norfolk.</p>	<p>development of the policy. For information: Policy SD14 relates to the Transport Impact of New Development, where development proposals would be assessed against 5 criterion. Point 2 states 'the proposal is capable of being served by safe access to the highway network without detriment to the amenity or character of the locality. Point 4 states that 'the expected nature and volume of traffic generated by the proposal could be accommodated by the existing road network without detriment to the amenity or character of the surrounding area or highway safety.' Para. 109 is quoted from the NPPF, which relates to the prevention or refusal of development on highway</p>



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					grounds in relation to an unacceptable impact on highway safety or the residential cumulative impacts on the road network would be severe. Para. 109 refers to an unacceptable impact and not a 'significant' impact on highway safety and therefore, it is considered that the Policy wording accords with para. 109 in this regard.
SD14	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Supported and is conducive to good place-making. The policy should be consistent with NPPF paragraph 104 to achieve soundness.	Support noted.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD14)
<b>Objection</b>	1	Feedback was supportive of the approach and general principles however more emphasis could be given around how the impacts of air quality could be addressed through this policy. Criteria 4 was objected to as onerous and above that required
<b>Support</b>	3	

<b>General Comments</b>	1	through national policy. Further consideration of Para 104 of the NPPF which promotes high quality walking and cycle parking and the recognition of other forms of transport network was promoted for the Council's consideration.
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**Alternatives**

SD14	Mr & Mrs Johnson (1215700)	AC022	Support	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b></p> <p>Partially Supports Assessment SD14. Development should take place in areas where there is access to facilities and employment in order to limit road use. The impact of additional junctions, traffic lights and roundabouts on the flow of existing traffic should be considered. There are many examples – not necessarily in Norfolk- where a large development such as a supermarket or retail park has been allowed to have a traffic light controlled junction onto a major route causing long delays in through traffic. Inconvenience for many people on a daily basis result - all so that one business can make a profit.</p>	Comments noted: This comment repeats the support SD14 made against the First Draft Local Plan (Part 1).
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## Policy SD15 - Parking Provision

### (Regulation 18 responses)

#### Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD15	Hurdle, Mr David (901803)	LP067 LP068	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> As well as cycle parking in new developments should there not be a policy of simply providing cycle parking in town centres? why not simply ensure provision of cycle parking in town centres, whether development or not?
SD15	Hurdle, Mr David (901803)	LP069 LP064	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Does the proportion reflect that north Norfolk is the UK's third highest for people aged 65+? Can this specific question please be addressed? My experience is that there is insufficient such parking. And many visitors are blue badge drivers also.
SD15	Johnson, Mr & Mrs (1215700)	LP139	Support	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Agree. Parking on rural roads in villages should be discouraged. Narrow roads which fall short of current design standards for width, sightlines, footways and alignment can become dangerous if partially blocked or narrowed or sightlines are blocked by inappropriate parking. Access for residents and emergency vehicles in particular can become difficult. Parking that does not impact on access roads should be encouraged and built into the development. Parking on rural roads in villages should be discouraged.
SD15	Hall, Mr Stephen (1215856)	LP219	Object	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Policy needs to reflect a differential between rural development and urban development. NPPF Section 9, para 105 a-e allows for a differential. To have the same parking standard in Sheringham/Cromer as in a rural village such as Southrepps does not make sense due to the lack of availability of sustainable transport. consider increase that parking standard for 3/4 bed house in rural locations to reflect NPPF considerations and local evidence

SD15	Hall, Mr Stephen (1215856)	LP218	Object	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> The current parking standards ( Appendix 1) are based on evidence from over 10 years ago and need updating. NPPF para. 105 (a-e) deals with local parking standards and clearly states what should be taken into consideration. To have the same standards for parking in Cromer/Sheringham as in growth villages such as Southrepps does not make sense. Due to the lack of public and sustainable transport options para 105 c (NPPF) there is a higher requirement for private cars. To have a parking standard of 2 spaces for a 2 or 3 bed house including the garage does not make sense. Many of the houses now built have small gardens and therefore the garage is used for storage. A 3 bed house then only has one parking space with the potential for 3 or more cars requiring parking, leading to parking on the roads but more often on pavements. The Council should also adopt a policy of not allowing conversion of garages if it reduces the parking below standard requirement. Outside of the main towns which are served with good transport links the parking standard should be increased for a 3 and 4 bed properties. To adopt a policy to stop garage conversion if it means that the parking provision falls below the required current standard</p>
SD15	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Parking Provision In our experience, adequate and well designed parking is essential to a harmonious community. We would hope to see this policy upheld and implemented.</p>

Individuals	Number Received	Summary of Responses (Policy SD15)
Summary of Objections	2	Objections suggest that there should be a differential between development in rural areas and urban areas in line with paragraph 105 in the NPPF.

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

### Parish & Town Councils

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

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

### Statutory Bodies & Other Organisations

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

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

### Alternatives

SD15	Mr Hall (1215856)	AC054	Object	<p><b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b></p> <p>Object to SD15 - The provision of parking in residential areas needs to be increased. The exact thing you are trying to avoid, parking on Highways, footpaths will happen with your existing policy. Therefore it is possible a 3 bed house could have 3 cars and only 1 external parking space. This will be more relevant in rural areas where sustainable transport options are not realistic or available.</p>	Comments noted: Objects to Assessment of 15A. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car. It is considered that poorly designed schemes can lead to inappropriate parking and highway issues and appropriate provision alongside new development to minimum standards and above is necessary. The approach adopts the County Council standards.
SD15	Mr & Mrs Johnson (1215700)	AC023	Support	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b></p> <p>Partially supports assessment SD15. Parking on rural roads in villages should be discouraged. Narrow roads which fall short of</p>	Comments noted: This comment repeats the support SD15 made

			current design standards for width, sightlines, footways and alignment can become dangerous if partially blocked or narrowed or sightlines are blocked by inappropriate parking. Access for residents and emergency vehicles in particular can become difficult. Parking that does not impact on access roads should be encouraged and built into the development.	against the First Draft Local Plan (Part 1).
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## Policy SD16 - Electric Vehicle Charging

### (Regulation 18 responses)

#### Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
SD16	Johnson, Mr & Mrs (1215700)	LP139	Support	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> It is a fallacy that electric vehicles are the cure for traffic pollution and carbon dioxide emissions. Electricity has to be generated and all electric cars do is move the point at which CO2 is generated from car engines to a central location in the form of a power station. There is a failure at central Government level to provide sufficient future power generation capacity to meet the predicted demand from electric cars or for phone charging, smart devices and home computers Windfarms are not enough and the government has failed to make provision for the additional power generation needed. It is nevertheless important to provide appropriate connection for when the real problem of future power generation is resolved. The way to reduce pollution is to reduce traffic. That can be done by making sure housing development takes place near areas of employment and broadband is suitable for home working.
SD16	Rose, Mr Alan (1217227)	LP580	General Comments	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> With the rise of electric cars, it is important that more electric charging points for vehicles are installed.



SD16	Brooks, Mr David (1217039)	LP251	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> What infrastructure is being planned in order to provide charging points for electric vehicles in the anticipation of transition from petrol and diesel transport modes. There appears to be a considerable lack of this facility in the North Norfolk area.
SD16	Adams (1215905)	LP590	Support	Every new dwelling must be provided with a private parking space on the plot associated with the dwelling with access to a secure and safe charging point
SD16	Green, Mr Stephen (1218541)	LP770	General Comments	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> New homes must all have one active standard charge-point for electric vehicles.
SD16	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> We recognise the need for vehicle charging points within proposals for development of all kinds and we welcome this policy. What we would like to see is the removal of the phrase where practical from the first line of the policy.
SD16	Dixon, Cllr Nigel (1218612)	LP738	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Should ensure electric vehicle charging infrastructure for public car park use (and to incentivise businesses to do the same) as well as points for new homes.

Individuals	Number Received	Summary of Responses (Policy SD16)
Summary of Objections	0	None received
Summary of Supports	2	Two support this policy, suggest that every new dwelling should be provided with a private parking space with access to a charging point. One doesn't consider electric vehicles as the solution for reducing traffic pollution and carbon dioxide emissions

		as it is just moving the point at which the Co2 is being generated to a central power station. Have to reduce traffic to reduce pollution.
<b>Summary of General Comments</b>	5	Five general comments received. Support for the provision of electric charging points for homes and public car parks but concerns with how these will be delivered with the lack of existing infrastructure in place. Suggest changes to remove the phrase where practical from the first line of the policy.
<b>Overall Summary</b>		Overall support for the provision of electric charging points, but concerns with how this will be delivered. Suggest change to wording to remove the phrase where practical from the first line of the policy.
<b>Council's Response</b>		Support noted. The provision of charging points reflects the move to providing the required infrastructure to support the wider role out of electric vehicles and the move to a lower carbon economy by 2040. The UK power generation as a whole is moving to a lower reliance on fossil fuel generation. The provision for such infrastructure is included in the Plan under SD16

#### Parish & Town Councils

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

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

<b>Support</b>	0	
<b>General Comments</b>	0	

### Statutory Bodies & Other Organisations

<b>Draft Policy</b>	<b>Name &amp; Comment ID</b>	<b>Ref</b>	<b>Nature of Response</b>	<b>Summary of Comments (Statutory Consultees &amp; Other Organisations)</b>	<b>Council's Response</b>
SD16	Broads Authority (321326)	LP806	General Comments	Could electric charging points be lit? Boat electric points tend to be. If they are lit, this could add to light pollution.	Noted: Consider clarification in future iteration of the Plan
SD16	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning (1218489, 1218491)	LP803	General Comments	Our client is generally supportive of the inclusion of electric vehicle (EV) charging points as part of new residential development proposals. It is, however, important to ensure that the policy lends itself to levels of EV parking provision that is both proportionate and practical in respect of both delivery and management.	Noted Consider comments in the finalisation of the policy: It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD16	Blakeney Hotel (Mr John Long, John Long Planning Ltd) (1216065 & 1216646)	LP228	Support	<p><b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b></p> <p>Blakeney Hotel supports Policy SD16’s aims and is keen to provide additional electric vehicle charging points at the Hotel. However, the Hotel has concerns over the potential costs that would be incurred in providing the capacity in the electricity supply and distribution network needed to provide such charging points, which may be prohibitive. The Hotel requests that the policy is amended to only require the provision of electric charging points where it is technically feasible and financially viable to do so, taking into account the cost of electricity infrastructure reinforcement and upgrades. The Hotel note that the Policy includes provision for an ‘in lieu’ payment to be made, but there is no indication of what the level of contribution would be; or how it would be calculated. Blakeney Hotel therefore also requests that the Plan includes more detail on the level of contribution and/or how it would be calculated.</p>	<p>Support noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					proposals which must be taken as a whole. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car
SD16	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP681	General Comments	<p><b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b></p> <p>Larkfleet provide general comments on Policy SD16 as follows:</p> <p>There is a cost to this in terms of the network within the parameters of a housing development , but the network outside of the site and generating capacity will also need to be sorted and at the moment this seems unlikely to happen. Providing electrical chargers on every home is not realistic as not every household will have an electric car for many years to come and by the time a significant proportion do so, the technology will have advanced so much that plugging a car in to charge will be redundant. In the long term, with autonomous vehicles the need for parking at home is questionable and this could fundamentally change the urban design of future developments, freeing up significant amounts of land which would otherwise be used for the storage of vehicles.</p>	Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The local plan seeks to promote sustainable development and is reflective of the rural nature of the District where there is an overreliance on the private car. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan
SD16	Persimmon Homes (Anglia),	LP495	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Persimmon Homes (Anglia) recognise the environmental importance of	Noted, Consider comments in the development the

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	Mr Kian Saedi (1217416)			ensuring that all new cars are zero carbon by 2040 and share the Government's ambition to achieve this target. However, Persimmon Homes (Anglia) emphasise the need for Policy SD16 to be informed through consultation with UKPN to ensure that the provisions of the policy are achievable and the network has capacity to accommodate the associated increase in domestic electricity demand that would result from the policy.	policy approach. The Local Plan supports the transition to a low carbon future.
SD16	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP619	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Supports the ambition to ensure all new residential developments have access to electric charging points; and accept that it will become a customer expectation. However, the Council may wish to consider a change to the Policy to acknowledge that the provision should be subject to technical feasibility, for instance, by taking account of the additional loading necessary to deliver the requirement and the available capacity of local electricity infrastructure.	Support noted. Consider comments in the development of the policy.
SD16	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP315	General Comments	The implementation of a policy promoting the provision of electric vehicle charging in new development is to be welcomed. Norfolk Homes has already started to make provision for electric charging points in the garages of new schemes (detached homes); such provision more widely for private drives/garages ought not to present any general difficulties. It is less easy in the absence of a garage, however, and we raise concerns about how the management of communal charging points will operate in practise. In the cases where affordable houses are grouped and controlled by an RSL, then this is more easily managed. The policy suggests that "passive charging points ... should be made available to all residents in accordance with a management agreement." In theory this could be done via a management company but is open to criticism from	Support noted. Consider comments in the future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>those residents who do not charge cars having to subsidise those that do. This is a Common Pool Resource (CPR), where a resource benefits a group of people - in this case car charger users - but provides reduced benefits to everyone else. The non-users still need to pay into the scheme/maintenance of the charging ports. The policy notes: "For major developments, details of how the required electric vehicle charging points will be allocated, located and managed should be included within the relevant Transport Assessment or Transport Statement. The management of the charging points, including the mechanism/procedure for taking payments, will be the responsibility of the developer/occupier". Does this mean the statutory definition of 'major development', as Transport Assessments/Statements will not necessarily be required for all such? If the provision for communal spaces is to be passive" (see definition at footnote of the policy) how is the management and the taking of payments to be the responsibility of the developer, including when the developer has completed and sold the development? We emphasise support for the principle of electric vehicle charging provision but believe that further thought needs to be given to the issue of active/passive provision, and to the subsequent management/payment processes (avoiding superfluous/onerous expectations on the developer post provision). For further note/consideration: the reference in paragraph 7.120 to the use of street light columns to accommodate charging points is somewhat at odds with the trend of reducing street lighting. Depending upon design, such might encourage on-street parking and may require estate roads to be widened to accommodate cars parked on the road to charge. Possible amendments required to clarify meaning/intent</p>	



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD16	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Supports facilitating the use of new, sustainable technologies such as electric vehicles.	Support noted.

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

### Alternatives

SD16	Mr & Mrs Johnson (1215700)	AC024	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> It is a fallacy that electric vehicles are the cure for traffic pollution and carbon dioxide emissions. Electricity has to be generated and all electric cars do is move the point at which CO2 is generated from car engines to a central location in the form of a power station. There is a failure at central Government level to provide	Comments noted: This comment repeats the support SD16 made against the First Draft Local Plan (Part 1).
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				<p>sufficient future power generation capacity to meet the predicted demand from electric cars or for phone charging, smart devices and home computers Windfarms are not enough and the government has failed to make provision for the additional power generation needed. It is nevertheless important to provide appropriate connection for when the real problem of future power generation is resolved. The way to reduce pollution is to reduce traffic. That can be done by making sure housing development takes place near areas of employment and broadband is suitable for home working.</p>	
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**Policy SD17 - Safeguarding Land for Sustainable Transport**

**(Regulation 18 responses)**

**Individuals**

<b>Draft Policy</b>	<b>Name &amp; Consultee ID</b>	<b>Ref</b>	<b>Nature of Response</b>	<b>Summary of Comments (Individuals)</b>
SD17	Walker, Mrs Kerry (1217345)	LP331 LP631	Object	Hoveton is omitted from the list of settlements where land should be safeguarded for Sustainable Transport use.
SD17	Johnson, Mr & Mrs (1215700)	LP139	Support	Agree

SD17	Ringer, Mr Callum (1218562)	LP772	Object	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> NNDC needs to be more pro-active in encouraging the re-building of the rail link in to Fakenham and also into Holt and the extension on the bittern line to serve this town, especially as it is an identified growth town. Safeguarding the track bed alone is not particularly visionary and the council should be more pro-active.
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Individuals	Number Received	Summary of Responses (Policy SD17)
Summary of Objections	2	This policy received two objections. Would like to see the rail link to Fakenham and Holt reintroduced and Hoveton included in the policy list where land will be safeguarded for Sustainable Transport use.
Summary of Supports	1	One supports this policy.
Summary of General Comments	0	None received
Overall Summary		Overall support for this policy. Would like to see the rail link to Fakenham and Holt reintroduced and Hoveton included in the policy list where land will be safeguarded for Sustainable Transport use.
Council's Response		The first part of the policy already provides an appropriate response for the safeguarding of track beds in the suggested locations.

## Parish & Town Councils

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

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

## Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
SD17	Natural England (1215824)	LP717	Support	Safeguarding Land for Sustainable Transport We support the safeguarding of disused railway routes and the use of these routes as sustainable transport links and facilities. We also highlight the potential of these routes as footpaths, cycle ways and bridle ways as an option for improving GI, biodiversity networks and connectivity. We recommend direct communication with King's Lynn Borough Council where routes cross boundaries.	Support welcomed
SD17	Wells & Walsingham	LP579	Support	WWLR comments on Local Plan Wells and Walsingham Light Railway (WWLR) is a unique tourist attraction in Wells, and has operated now for 37 years. It is entirely	Comments noted consider

	Railway, Mrs Jo Meakin (1217469)		<p>self-financing and makes no call on public funds. For over eight months of the year it provides daily scheduled public transport between Wells, Warham, Wighton and Walsingham; offering up to five return trips per day at the height of season. It is a local employer, brings tourists to Wells and Walsingham and spends the majority of its money in Wells or nearby. The primary, secondary and tertiary benefits of the railway are not insignificant to the local tourist economy and infrastructure. In our view it offers potential relief to traffic congestion in peak season by serving as a park and ride service for day trippers. Visitors to Wells could park in Walsingham and complete the last four miles of their journey by train. There is scope to increase car parking beside the coach park at the old goods shed in Walsingham. Additionally, a large overflow car park at our Wells terminus on the Stiffkey Road offers short-term relief at the height of season with potential for pay to park spaces with a 15-20 minute walk to the harbour. The original station, on Polka Road, is now a pottery and bookshop. The former trackbed to it has been partly built on in Maryland, but there is also a trackbed to East Quay, which is currently designated a byway open to all traffic. It could serve as an excellent arrival point for pedestrians using the railway as a park and ride. In other coastal resorts, such as St Ives in Cornwall, the branch line railway serves as a park and ride in high season, allowing many more visitors to reach the town than could be provided with car parking spaces. The WWLR requests that no building takes place on any of the former railway routes in Wells, to keep these open for eventual park and ride services, which the railway looks forward to operating.</p>	comments in the finalisation of policy SD17
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Statutory & Organisations	Number Received	Combined Summary of Responses (Policy SD17)
Objection	0	
Support	2	

<b>General Comments</b>	0	Limited comments were received on this policy. The safeguarding of sustainable transport routes was supported highlighting the potential for footpaths and Green infrastructure. The addition of Wells next the Sea and in particular land at Wells & Walsingham railway was put forward for consideration as a further location to protect.
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**Alternatives**

SD17	N/A	N/A	N/A	No comments received.	N/A
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## Pollution & Hazard Prevention and Minimisation

**The purpose of this policy** is to minimise and ~~where possible~~ reduce, all emissions and other forms of pollution, including light and noise pollution, and ensure no deterioration in water quality.

The Local Plan plays a key role in determining the location of development that may give rise to pollution, either directly or indirectly, and, as far as possible, in ensuring that other uses and development are not affected by major existing or potential sources of pollution. New development should minimise all types of pollution and where possible seek to reduce emissions and other pollution in order to protect the natural environment.

The policy is intended to restrict polluting development, and not cover general amenity issues around small scale uses such as hot food takeaways that will be covered by planning conditions and Environmental Health regulations.

### Air Quality

Air quality **is important to the environment and human health**. In North Norfolk **air quality** is generally good and monitoring shows that pollutants are within target values. Annual average concentrations of Nitrogen Dioxide in the latest period did not exceed the national objective. The only exception to this was a single peak in Hoveton. However, this was only a single month and the concentration gradually declined (27). To date no Air Quality Management Areas have been declared. The Council will continue to monitor air quality for the foreseeable future, **but it should be noted that air quality requirements are likely to become stricter over the time period of the Plan and that restrictions on particulate matter and Nitrogen Oxide may need reviewing in light of these future changes**.

### Water Quality

Many water courses in North Norfolk **and neighbouring areas, such as The Broads**, have national or international environmental designations and it is particularly important that water quality standards are met. New development must ensure that any effects such as increases in sewage effluent discharges can be achieved without detriment to water quality.

**Developers must be mindful that the pollution of ground water and/or surface water is an offence under the Water Resources Act 1991. As such, proposals should take account of the objectives of the Water Framework Directive (WFD) (28) and the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended), as the maintenance and improvement of the status of water is an important factor in the protection of the designated habitats or species.**

The WFD ~~has an aim of preventing~~ **objectives require no** deterioration in water status and **improvement in** water quality and consequently, developers must ~~strive~~ to achieve the objectives contained within it. **As such, any developments impacting the water environment must carry out a WFD compliance assessment. The Anglian river basin district River Basin Management Plan 2015 (RBMP)\* is the key over-arching source of information on the water environment, including the condition of water bodies and measures to help meet the objectives of the Water Environment Regulations 2017.**

(27) North Norfolk District Council, 2017 Air Quality Annual Status Report; p,i.

(28) Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community Action in the field of water policy.

\* [Anglian RBD Part 1 river basin management plan.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/421111/Anglian_RBD_Part_1_river_basin_management_plan.pdf)

## Light and Noise Pollution

Light and noise pollution arising from new development can, individually and cumulatively, have a significantly damaging impact on the countryside and settlements in North Norfolk where many places do not have street lights and where the tranquil environment is highly valued.

Paragraph 180 of the NPPF relates to development being appropriate for its location; referring specifically to noise and light pollution, and draws attention to intrinsically dark landscapes and nature conservation. North Norfolk boasts some of the darkest skies in the county and this lack of artificial light helps the area retain its rural character. **Respecting the scenic quality, maintaining an area's distinctive sense of remoteness and nocturnal landscape character as identified through the Landscape Character Assessment SPD 2021 are integral parts of policies ENV1 and ENV2** including The Norfolk Coast Area of Outstanding Natural Beauty Partnership has as part of its 20 year vision that "the area will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity, with wide skies, seascapes and dark night skies that show the richness and detail of constellations."<sup>(29)</sup> To date, two locations in North Norfolk (Wiveton Downs and Kelling Heath Holiday Park) have been awarded as Dark Sky Discovery Sites <sup>(30)</sup> and special attention should be given to these areas and the wider AONB. External lighting in new development should be limited to that necessary for security **and** consideration should also be given to ways of minimising light pollution from **using sensitive design details, for example, to avoid** large glazed areas.

The NPPG provides further **detailed** 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 <sup>(31)</sup>. This guidance the information set out in the North Norfolk Landscape Character Assessment SPD, **and the North Norfolk Design SPD** will be used to inform decision making.

**To help reduce the impact of noise, appropriate and proportionate mitigating measures will be required where a proposal is likely to result in some adverse impact on the health, well-being and quality of life of future occupiers of the proposed development by increasing their potential exposure to existing sources of noise in the vicinity. In determining individual proposals for noise generating uses or uses which may increase noise exposure, account will need to be taken of the operational needs of a business, the character and function of the area, the levels of neighbourhood noise which might be reasonably expected in the daytime, evening and late at night, the disposition of uses and activities in the vicinity in relation to residential occupation, and the reasonable expectation of residents for a high standard of amenity and a period of quiet enjoyment for at least part of the day. 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.**

<sup>29</sup> <http://www.norfolkcoastaonb.org.uk/partnership/dark-skies/1120> accessed 05/12/18.

<sup>30</sup> <http://www.norfolkcoastaonb.org.uk/partnership/dark-sky-discovery-sites/1160> accessed on 05/12/18.

<sup>31</sup> <https://www.gov.uk/guidance/light-pollution> Paragraph: 001 Reference ID: 31-001-20140306 to Paragraph: 007 Reference ID: 31-007-20140306 accessed on 05/12/18



## Contaminated Land

In accordance with the provisions of the NPPF, local authorities must ensure that sites are suitable for development taking account of ground conditions, pollution arising from previous uses and any proposals for land remediation. Contaminated land is also a consideration.

The most frequent cases of contaminated land in North Norfolk are old quarries that have been filled with unknown material, old brickworks, old town gas sites, ochre, previous landfill sites and bio-contamination from animals. Redundant RAF bases are a potential source of contaminated land that may come forward as new uses are considered. Some of these have already been made suitable for use through the planning system, and future development will continue to present opportunities for remediation. It is important that these issues are identified and addressed early in the preparation of proposals for a site. In order to ensure a sufficient and proportionate level of information is provided, a Contaminated Land Assessment will need to be submitted for all new development proposals where contamination is known or suspected (on the site or on adjacent land) and/or where the proposed use would be particularly vulnerable to the presence of contamination, for example for any residential schemes, care homes, holiday lets, allotments, small holdings.

Remediation should remove unacceptable risk and make the site suitable for its new use. As a minimum, after carrying out the development and commencement of the new use, the land should not be capable of being determined as contaminated land under the relevant Regulations (32).

The Environment Agency offers a charged for discretionary planning advice service (33) and the Health and Safety Executive provides advice online via their 'Planning Advice Web App' \* and a more detailed 'Consultancy Package' (34) service to seek to ensure that contaminated land / pollution / hazard issues are resolved before an application is submitted.

(32) Part IIA of the Environmental Protection Act 1990.

(33) <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals#when-you-can-pay-for-agency-advice> accessed on 05/12/18.

\* [HSE: Land use planning - PADHI+ - HSE's on-line advice](#)

(34) <http://www.hse.gov.uk/landuseplanning/developers.htm> accessed 05/12/18. Confirmation whether proposed development is within a HSE consultation zone of a major hazard site or major accident hazard pipeline is a free service. Any detailed advice relating to a proposed development is a charged service.

### Policy SD 13

#### **Pollution & Hazard Prevention and Minimisation**

All development proposals **will protect the quality of the environment and will** ~~should avoid, minimise and where possible take every opportunity to,~~ reduce **through proportionate mitigation measures,** all emissions, **contamination** and other forms of pollution, ~~including light and noise pollution and ensure no deterioration in water quality.~~ Proposals will **only need to comply with statutory environmental quality standards and demonstrate** ~~be permitted where, individually or cumulatively, there are no~~ **that the development would not give rise to adverse unacceptable** impacts on;

1. the natural environment ~~and general amenity;~~
2. the health and safety of the public;
3. air quality;
4. water quality, including surface water and groundwater ~~quality;~~
- 5. light and noise pollution; and**
- ~~6. land quality and condition. ; and,~~
- ~~6. the need for compliance with statutory environmental quality standards.~~

Exceptions will only be made where it can be clearly demonstrated that the environmental benefits of the development and the wider social and economic need for the development outweigh the adverse impact.

Proposals for development should minimise the impact on tranquillity and dark skies in North Norfolk and the adjoining Authorities' areas.

Development proposals on contaminated land (or where there is reason to suspect contamination) must include an assessment of the extent of contamination and any possible risks. Proposals will only be permitted where the land is, or is made, suitable for the proposed use.

Development that ~~increases~~ **would result in unacceptable\*** risk to life or property, ~~except for that which is necessary to the operation of the use causing the hazard,~~ will not be permitted in:

1. Major Hazard Zones (35) ;
2. in the vicinity of existing developments that require particular conditions for their operation or that are authorised or licensed under pollution control or hazardous substances legislation (including hazardous pipelines) where new development would be likely to impose significant restrictions on the activities of the existing use in the future.

\*As informed by advice from the Health and Safety Executive and national guidance.

(35) As identified by the Health and Safety Executive

### Transport

The planning system should actively manage patterns of growth, address the impacts of development on transport networks, promote opportunities to increase walking, cycling and use of public transport, and ensure that patterns of movement, streets, parking and transport considerations are an integral part of designing schemes.

Reducing the reliance on the private car and promoting active lifestyles are mutually beneficial aims that can be achieved by supporting sustainable travel options. Whilst the opportunities to maximise sustainable transport solutions are more challenging in rural areas, this makes it even more important to embrace changing transport technology and usage, as well as focus development in locations that reduce the need to travel by car and by providing a choice of transport modes. This in turn, helps reduce emissions and improves air quality and public health. In addition, changing work practices, including working from home, is higher in North Norfolk at 16% when compared to England at 10% (2011 Census) and the likelihood is that this percentage will increase post-pandemic.

Norfolk's 3rd Local Transport Plan, Connecting Norfolk, sets out the strategy and policy framework for transport up to 2026. It guides transport investment in Norfolk and is considered by other agencies when determining planning or delivery decisions. The strategy is accompanied by an implementation plan, setting out the measures to be delivered over the short term. It envisages "A transport system that allows residents and visitors a range of low carbon options to meet their transport needs and attracts and retains business investment in the county. It sets out six strategic aims, which are: maintaining and managing the highway network; delivering sustainable growth; enhancing strategic connections; reducing emissions; improving road safety; and improving accessibility. The Plan is currently being updated, with the intention of being adopted in April 2021. It aims to respond to a number of challenges, including addressing air quality and carbon reduction, as these remain key priorities.

Norfolk County Council's Cycling and Walking Action Plan (2016) seeks to encourage walking and cycling within the District illustrating the advantages to health and wellbeing, reducing carbon emissions and encouraging tourism. The Plan seeks to identify more opportunities to improve and link cycle and walking networks. The Norfolk Strategic Infrastructure Delivery Plan 2020 details a range of projects for infrastructure improvements across the County. One of the sustainable projects relates to Weaver's Way, which utilises Public Rights of Way and the route of a disused railway line. The project is mainly focused on revitalising the disused railway line between Aylsham and Stalham. Route improvements include new surfacing to ensure year-round accessibility for walkers (including access for impaired users) and cyclists.

The policies in this section are intended to ensure that the transport impacts of new development are properly managed and that opportunities from changing transport technology and usage become a requirement for relevant new development proposals.

### Transport Impact of New Development

**The purpose of this policy** is to ensure that the public highway remains safe and convenient to use for all road users.

A primary planning consideration is to ensure that development proposals achieve a suitable connection to the highway that is safe for pedestrians, cyclists and occupants of vehicles. Equally important is the need to ensure that road safety is not jeopardised by allowing proposals that would generate levels of traffic beyond the capacity of the surrounding road network.

All new development is required to address the transport implications of that development. Larger schemes are required to prepare **Travel Statements** or Transport Assessments (TA) to illustrate how the amount of trips generated will be accommodated and how accessibility to the site by all modes of transport will be achieved. For ~~non-residential~~ proposals that are likely to have significant transport implications, the Government also requires the submission of Travel Plans, the purpose of which is to promote more sustainable forms of transport in relation to the activities of a particular development (e.g. encouraging reductions in car usage and increased use of public transport, walking and cycling). **The PPG also provides information on the circumstances in which Travel Plans, Transport Assessments and Transport Statements will be required and what they should contain**

The Principal Routes shown on the Policies Maps (36) accord with the **primary and** principal routes of the County Council route hierarchy. Proposals that involve a new direct access onto these roads (where the only access is directly onto the road), will not be permitted in order to assist with traffic flow and reduce risk. Exceptions will only be made where the type of development is such that it requires a principal route location, such as road side service stations. **Transport Statements will be required for residential developments of between 50-100 dwellings. Transport Assessments and Travel Plans will be required for residential developments larger than 100 dwellings. Non-residential development will be considered on a case by case basis.**

#### Policy SD 14

##### Transport Impact of New Development

Development will be **well located and** designed to ~~reduce~~ **minimise** the need to travel and to maximise the use of sustainable forms of transport appropriate to its particular location. Development proposals will be considered against the following criteria:

1. the proposal provides for safe and convenient access on foot **and by** cycle, public and private transport addressing the needs of all, including those with a disability;
2. the proposal is ~~capable of being~~ served by safe **and suitable** access to the highway network without detriment to the amenity or character of the locality;
3. outside designated settlement boundaries the proposal does not involve direct access on to a Principal Route, unless the type of development requires a Principal Route location;
4. the expected nature and volume of traffic generated by the proposal ~~could~~ **can** be accommodated by the existing road network without detriment to the amenity or character of the surrounding area, ~~or that it would not~~ **cause an unacceptable impact on** highway safety and **that any residual cumulative impacts on the road network would not be severe;**
5. if the proposal would ~~have~~ **generate** significant **amounts of traffic movement** ~~transport implications,~~ it is **supported by a Travel Plan. In the case of larger schemes, the proposal is accompanied by a Transport Statement or Transport Assessment, the coverage and detail of which reflects the scale of development and the extent of the transport implications. , and also, for non-residential schemes, a travel plan.**

**Policy SD13/ HRA (link to other policies if thought appropriate)**

(36) The existing Principal Routes can be seen on the Core Strategy Proposals Map <https://www.north-norfolk.gov.uk/proposalsmap>

## Parking Provision

The purpose of this policy is to ensure the provision of adequate **safe and secure vehicle and cycle** parking.

Government policy seeks to restrict levels of motor vehicle parking associated with new development in order to reduce the use of the private car and to promote more sustainable forms of transport. The provision of parking space can affect the overall appearance of a development and result in an inefficient use of land, therefore careful consideration should be given to how parking provision is incorporated into development proposals. The Framework allows planning authorities to set local parking standards for residential and non-residential development. Local standards should take into account accessibility of the development, type, mix, and use of the development, availability of and opportunities for public transport, local car ownership levels and the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles (ULEV).

**The 2011 Census data revealed that travel to work by car in North Norfolk is higher at 61% compared to England at 54% and travel to work by public transport is significantly lower in North Norfolk at 3% when compared to England at 16%.** Given the rural nature of North Norfolk and the limited availability of public transport, it is considered essential that appropriate levels of parking is provided within new developments. Insufficient or poorly designed parking provision associated with new development can lead to problems of inappropriate parking on streets, pavements and verges creating highway safety issues and unsightly environments. Over-provision and poor management can lead to the inefficient use of land and can also discourage greater use of more sustainable modes of transport. Whilst recognising the reliance on the private car within a rural district and the need to provide adequate parking, development proposals should seek to support a transition from diesel and petrol fuelled cars to electric powered cars by including active and / or passive provision for electric vehicle charging points where practicable. In addition, designs should strive for flexibility, due to the likelihood of future technology-led changes to the way in which cars and other vehicles are used. Wherever possible, designs should be adaptable, allowing for features, such as new charging technologies, to be incorporated at a later date or for the conversion of parking areas to green space. However, it remains important to address how parking at the existing rate of private car ownership can be accommodated successfully into design.

In addition, vehicle parking is an important tool for visitor management particularly in relation to tourism across the District. Consequently, the provision of off-street visitor parking, particularly where it applies to tourism and town centre development, will be supported in appropriate locations.

In considering appropriate levels of cycle and car parking **for development proposals**, reference **the starting point** will be given to the **County Council's** parking provision standards as detailed in 'Appendix 1: Parking Standards' of this document which are based on the standards adopted in the North Norfolk Core Strategy 2008 and the **latest** Parking Standards for Norfolk 2007. Proposals should demonstrate how adequate off-road parking will be provided. However, these standards will be applied flexibly having regard to the circumstances of the site, the highway network, relevant advice on the design and integration of parking provision into development and place-making. For example, the parking requirements may be adjusted to help achieve good design objectives at locations with good walking access to public transport and essential services, and in order to help protect heritage assets and designated Conservation Areas.

~~The parking standards may need to be reviewed over time to provide for new initiatives in line with climate change and low carbon objectives. Therefore regard should always be had to the latest version available.~~

The Local Plan seeks to promote sustainable transport but recognises that due to the dispersed rural nature of the District there will be a continued reliance on car based travel, which requires appropriate provision of vehicle parking alongside new developments and in order to maintain the viability and vibrancy of the District's town centres, visitor locations and wider communities. It is considered that retaining public parking provision in the selected settlements at present levels is essential. Development proposals that would result in the loss of public parking provision will not be permitted unless alternative equivalent or better quality provision is made available in a suitable location prior to the commencement of redevelopment.

### Policy SD 15

#### **Parking Provision**

Development will be permitted where adequate **safe and secure** vehicle **and cycle** parking facilities are provided by the developer **within the plot or site curtilage** to serve the needs of the proposed development. ~~Development proposals should provide sufficient parking spaces~~ **and in order** to avoid inappropriate on-street parking, highway safety problems and to protect living and working conditions locally.

Development proposals should make provision for vehicle and cycle parking in accordance with the **latest County** Council's Parking Standards as a 'starting point' which may be varied in order to reflect local conditions such as the availability of public parking, sustainable travel modes and design and conservation objectives.

Vehicle and cycle parking should be integrated as a key element of design in development layouts to ensure good quality, safe, secure and attractive environments. Proposals will be expected to comply with the requirements of the North Norfolk Design Guide **(or any successive document)**.

In addition, development proposals will provide electric vehicle charging facilities in accordance with **Policy SD 16 'Electric Vehicle Charging'**.

Development proposals that would result in the loss of designated Car Parks identified on the Policies Maps will not be permitted. Elsewhere, development proposals that would result in the loss of public car parking facilities which make an important contribution to the local parking provision will not be permitted unless alternative equivalent or better quality provision is made available in a suitable location prior to the commencement of redevelopment.

## Electric Vehicle Charging

**The purpose of this policy** is to promote and ensure delivery of appropriate electric vehicle charging infrastructure and to future-proof new developments in the District.

~~The UK Government has announced their intention for all new cars and vans to be effectively zero emission by 2040.~~ Published in July 2018, the Government's Road to Zero (RTZ) strategy sets out the ambition for at least 50%, and as many as 70% of new car sales to be Ultra Low Emission Vehicles (ULEVs) by 2030, alongside up to 40% of new vans. This steers a significant shift away from diesel and petrol fuelled cars and vans towards electric powered vehicles. As part of this strategy, the Government considers that all new homes, where appropriate, should be electric vehicle ready by having a chargepoint available. As such, new development proposals that include the provision of parking should not only be mindful of this, but should support and will need to actively enable this transition (37).

To support this, the NPPF specifically references this strategy by requiring at paragraph 110 that "applications for development should... be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations". In addition, the Framework requires Local Planning Authorities, if setting local parking standards, to take into account the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

There is the potential that the next version of the County Council Parking Standards will incorporate required levels of EV charging points for different types of development. Any such future standards will be a material consideration and consequently, relevant development schemes will need to accord with either these standards or the details set out in this draft policy, whichever provides the greater level of EV chargepoint provision.

The Automated and Electric Vehicles Act 2018 came into effect on 19th July 2018. It gave the Government new powers to improve air quality and enhance public chargepoint availability, for example, by ensuring that motorway services are upgraded with plenty of points, and improving consumer confidence in charging their vehicles by: making sure that public chargepoints are compatible with all vehicles; standardising how they are paid for; setting standards for reliability.

However, access to overnight charging at home and charging at the workplace will be crucial in promoting the shift towards the use of plug-in hybrids and battery electric vehicles (EV). It is important therefore that new development seeks to encourage continued growth and responds to this essential change. The Government is also keen to ensure that people are not disadvantaged on the basis of having communal parking or by not owning their own home (38).

~~A Plan~~ The Policy requiring the installation of EV charging point infrastructure in new developments will provide an important delivery mechanism to support contribute to the Government's stipulated emissions reduction targets objectives by minimising one of the barriers to EV uptake and will assist in mitigating the impacts of climate change through reducing transport associated carbon emissions. This will also have positive benefits for local air quality.

37 The Road to Zero, Department for Transport, July 2018.

38 The Road to Zero, Department for Transport, July 2018

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. Development proposals should specify the type or types of chargepoints to be installed. 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. **There is the potential that the next version of the County Council Parking Standards will incorporate required levels of EV charging points for different types of development. Any such future standards will be a material consideration and consequently, any relevant development schemes will need to accord with either these standards or the details set out in this draft policy, whichever provides the greater level of EV chargepoint provision.**

**For major developments, details of how the required electric vehicle charging points will be allocated, located and managed will need to be included within a relevant Transport Assessment or Transport Statement. This information should also include details of any necessary management scheme for the chargepoints, including the mechanism/procedure for taking payments and who will have overall management responsibility.**

In determining the appropriate power capability to install at a given parking space the main consideration is how long vehicles would typically be expected to park at that location. Currently there are three levels of charging capability, notably: standard chargers - typically rated at 3kw that can fully charge a vehicle in 6 – 8 hours, ~~and~~ **which** are best suited for overnight charging. This being the standard used for residential properties as they can be installed as part of the electricity supply without any additional capacity on a distribution board; fast chargers - typically rated between 7-22kW that can fully recharge some models in 3-4 hours. rapid DC chargers that are typically rated at 50kW and can charge an EV to 80% charge in 30 minutes (depending on battery capacity).

As technology advances there may be changes to these figures, and regard should always be had to the latest and best available information. **Given the rapid change in technology and variations in provision, it is likely that Supplementary Planning Guidance will be needed to offer further information in this matter.**



## Policy SD 16

### Electric Vehicle Charging

Proposals ~~that incorporate vehicle parking or development should~~ **will** include ~~where practicable~~ appropriate provision for electric vehicle charging points. Electric vehicle parking spaces should be counted as part of the total parking provision and bays should be clearly marked **on a layout plan**. The delivery of chargepoints should not exclude parking space provision for people with disabilities. Proposals should specify the type of chargepoints to be installed.

**Proposals for** residential development (excluding use class C1 hotels and C2/C2A residential institutions) where private driveways and garages are provided, **will provide** 1 active\* charging point per unit, **in the form of** (an external charging point on a driveway or a wall mounted internal charging point in a garage). Where off-plot or communal parking is provided, a minimum of 50% of spaces ~~should~~ **will provide active\* chargepoints and the remainder will be passive\*\***. ~~and should~~ **The spaces should** be made available to all residents in accordance with a management agreement.

**Proposals for all** non-residential development, residential institutions (use classes C2/C2A) and proposals for stand-alone car parks, ~~should~~ **will** include active\* provision for electric vehicle charging points of a minimum **of** 1 charging point or 20% of all new parking spaces, whichever is the greater.

**Proposals for hotels** (use class C1) ~~should~~ **will** include active\* provision for electric vehicle charging points of **a minimum of** 30% of all new parking spaces.

For major developments, details of how the required electric vehicle charging points will be allocated, located and managed, ~~should~~ **including the mechanism/procedure for taking payments**, will be **detailed** ~~included with~~ in the relevant Transport Assessment or Transport Statement. ~~The management of the charging points, including the mechanism/procedure for taking payments, will be the responsibility of the developer/ occupier.~~

~~In cases where charging points, including infrastructure to enable retrofitting, cannot be provided within the development site, developer contributions may be sought to enable those facilities to be suitably provided in other locations including public car parks or on-street parking spaces.~~

~~Large Developments with dedicated electricity sub-stations should specify the sub-station to a sufficient capacity to fully cater for all electric vehicle charging requirements.~~

*\*Active - fully wired and connected chargepoints, ready to use points at parking spaces.*

*\*\*Passive - provision of the necessary underlying infrastructure (e.g. capacity in the connection to the local electricity distribution network and electricity distribution board, as well as cabling to parking spaces) to enable simple installation and activation of a chargepoint at a future date.*

## Safeguarding Land for Sustainable Transport

**The purpose of this policy** is to safeguard land for transport related uses.

The likely availability and use of public transport is a very important element in determining planning policies designed to reduce the need for travel by car. To this end, national policy requires local planning authorities to explore the potential, and identify any proposals, for improving public transport by rail, including the re-opening of rail lines. Such routes could also provide walking and cycle routes as an interim measure prior to the introduction of rail services.

Whilst the Government recognises that road transport is likely to remain the principal mode for many freight movements, it considers that planning policies can help to promote more sustainable distribution, including where feasible, the movement of freight by rail and water. Accordingly, it also requires local planning authorities to identify and, where appropriate, protect sites and routes, both existing and potential, which could be critical in developing infrastructure for the movement of freight (such as freight interchange facilities allowing road to rail transfer).

~~The current Norfolk Railfreight Strategy promotes the re-use of the former rail corridor linking Fakenham with the Mid-Norfolk Railway at County School in Breckland District and beyond for both rail passenger and rail freight transport use. The route of this corridor insofar as it relates to North Norfolk District is protected from prejudicial development. The Norfolk Rail freight Strategy identifies sites in Cromer, Fakenham, Great Ryburgh, Hoveton and North Walsham where it wishes land to be safeguarded for use as rail freight terminals through planning policy. The sites at Fakenham and Great Ryburgh are dependent on the previously mentioned reinstatement of the railway line between Fakenham and County School. Presently, only the site at North Walsham, operates as a freight terminal.~~

### Policy SD 17

#### Safeguarding Land for Sustainable Transport

Former railway track beds and other railway land will be protected from development that would be prejudicial to the re-use of railway, or sustainable transport links and facilities in the following locations:

1. Sheringham;
2. Fakenham to the District Council boundary (to the south of Great Ryburgh); and
3. sites currently in use as, or with potential for, rail freight terminal facilities in the following settlements:
  - a. Cromer
  - b. Fakenham
  - c. Great Ryburgh
  - d. North Walsham
  - e. Hoveton

*Awaiting County Council feedback*