

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

Schedule 3
Requested Modifications & Council Response leading to proposed modifications

Draft for Planning Policy Build Heritage Working Party

Schedule 3 - Requested Modifications & Council Response

Ref	Name / Organisation	Document Section	Para / Policy / Table / Map / Figure	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
LPS373	David Jones, Armstrong Rigg Planning (D L Ritchie will Trust)	1 Introduction	1.0.1	The need to allocated several thousand more homes and in particular larger / further sites in Ludham LUD01/A, (expansion) H0904 and LUD02	<p>This section along with section 2 outlines the contextual information and sets the scheme for the overarching Vision of the Plan along with the Aim and specific strategic objectives. These have been consulted on and updated in line with feedback as detailed in the Consultation Statement. The Plans third strategic aim sets out that the policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District as a whole. Where site modifications have been suggested these are considered in the relevant section of the Plan below</p> <p>No specific modification has been suggested</p> <p>Conclusion No change proposed.</p>	No	N/A
PC001	North Norfolk District Council	1 Introduction	1.1	Clarification that the Plan for the area comprises a combination of strategic and non-strategic policies In line with paragraph 17 -19 of the NPPF and make explicit in the Plan which policies are strategic in line with requirement of paragraph 21.	<p>Modification(s) is proposed for reasons of clarity. The requirement to identify strategic policies is a NPPF requirement.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/1.0/01
LPS765 LPS380 LPS493 LPS324	Mr Mark Behrendt (Home Builders Federation) David Jones, Armstrong Rigg Planning (D L Ritchie will Trust) Sarah Peters (Abzag Ltd) Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)	1 Introduction 2 Spatial Portrait, Vision Aims & Objectives	1 & 2	<p>Plan period is not consistent with national policy Paragraph 22 of the NPPF states that strategic policies in local plans should look "... ahead for a minimum of 15 years from adoption",</p> <p>In order to have a local plan that has a minimum of 15 full years after adoption the Council must extend the plan period to 2038/39 and ensure that there is sufficient development to meet assessed needs over this period.</p> <p>The stated plan period is 2016-2036 and the North Norfolk Local Development Scheme: Indicative Timetable December 2021 forecasts that the Local Plan will be adopted in June 2023. This means that on adoption the plan period will have 13 years remaining.</p> <p>The stated plan period is 2016-2036 and the North Norfolk Local Development Scheme: Indicative Timetable December 2021 forecasts that the Local Plan will be adopted in June 2023. This means that on adoption the plan period will have 13 years remaining. This is contrary to national policy at NPPF paragraph 22 that requires strategic policies to look ahead over a minimum 15year period from adoption. The plan cannot be considered sound if it is contrary to national policy and the plan period must therefore be extended to 2038 as a minimum</p>	<p>It is considered that the Plan provides for 15 years growth, and a policy framework which can be applied over 15 years in the way anticipated in the NPPF. In particular the Plan states that the strategic urban extensions at North Walsham and Fakenham are likely to continue to deliver growth beyond 2036.(Paragraph 7.1.10)</p> <p>No specific modification has been suggested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS276 LPS267	Mr Benjamin Bethell (Hoveton Parish Council) Mr Geoff Cook	1.3 Sustainability Appraisal	1.3	<p>The SA report is not satisfactory (page 268). Of particular concern, the proposed site allocation for Hoveton both loses high quality agricultural land and harms the landscape and wildlife</p> <p>Remove policy and Allocation HV01/B</p> <p>As above but no modification suggested</p>	<p>The Sustainability Appraisal has followed an iterative process that runs parallel to the production of the Plan where the main elements of the policies are appraised against a comprehensive set of sustainability objectives. Such objectives are included in the SA criteria and were consulted on as part of the process.</p> <p>It is not the role of the SA to determine the options to be chosen but to inform choices and as such the SA includes an assessment of all sites in the Local plan and is used to inform the detailed site</p>	No	N/A

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					assessments. More detail can be obtained through site assessments booklets along with further information from the site selection methodology Background paper. Conclusion No change proposed		
LPS361	Mr John Fleming (Gladman)	1.3 Sustainability Appraisal 1.5 Duty to Cooperate 2.3 Spatial Vision Spatial 2.4 Strategic Aims & Objectives	Various	General support is provided in relation to the areas listed along with specific modifications in relation to self-build homes, specialist housing clarification HOU2, HOU8, HOU9	Support noted. This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. No specific modification have been suggested in relation to these sections. Suggested modifications in relation to the specific policies are addressed in the schedule below. Conclusion No Change proposed discuss	No	N/A
LPS277 LPS268	Mr Benjamin Bethell (Hoveton Parish Council) Mr Geoff Cook	1.4 Habitat Regulation Assessment	1.4	The Habitat Regulation Assessment (HRA), produced by Footprint Ecology for NNDC, assesses the impact of the Local Plan on sites for biodiversity. However, this contains errors for the allocated land in Hoveton and therefore cannot be considered "sound" Remove allocation and policy HV01/B from the Local Plan	The Habitat Regulation Assessment, HRA fully considers the impacts/implications of a plan or project for European wildlife sites, in terms of any possible harm to the habitats and species that form an interest feature of the European site in close proximity to the proposed plan or project which could occur as a result of the plan or project being put in place. It is a step by step process of ensuring that a plan or project will not adversely affect the ecological integrity of a European wildlife site The findings of the HRA have been used as an integral part of relevant policy formation. Conclusion No change proposed	No	N/A
LPS278	Mr Benjamin Bethell (Hoveton Parish Council)	1.5 The Duty to Cooperate	1.5	Questions whether wider cross boundary issues with regard co-ordinated transport have been considered in the plan eg in relation to "pinch points" like Hoveton Wroxham. Remove the allocation HV01/B from the Local plan	The levels of growth and the proposed site allocations in Hoveton are supported by the Highways Authority. The County Council has undertaken a Market Town Network Improvement Strategy ¹ for the market towns in Norfolk which will identify the most effective transport improvements to support future planned growth and help address transport issues such as congestion, enhancements to safety and access to public transport. Conclusion No change proposed	No	N/A
LPS718	Mrs Debbie Mack (Historic England)	1.5 The Duty to Cooperate	1.5	Should Historic England also be mentioned here under duty to co-operate? We would welcome the preparation of a Statement of Common Ground with Historic England in due course	The section details the Norfolk Strategic Forum which oversee the production of the Norfolk Strategic Planning Framework (NSPF) document which sets out to demonstrate how the Local planning Authorities and public bodies have fulfilled their legal duties around the strategic impact across local authority boundaries. The Council have worked separately and in addition on local considerations during with relevant statutory bodies, including Historic England were we have worked closely on the Historic Impact Assessment and appropriate policy formation and the support for a Statement of Common Ground detailing these is	No	N/A

¹ [Market town network improvement strategy - Norfolk County Council](#) [Accessed 05/10/2022]

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					welcomed. The Council does not consider that the duty to cooperate section needs to be altered. There is no need to list all parties in this section of the Plan Conclusion No Change proposed		
LPS411	Sarah Hornbrook, Bidwells (Flagship Housing Group, ESCO Developments & Lovell Partnerships)	1.6 Viability Considerations	1.6	Further work should be undertaken in advance of Submission of the Draft Plan to update Viability Assessment and to introduce additional typologies relevant to larger strategic sites (eg those over 200 units) (or, if considered more appropriate, in accordance with paragraph 10-005-20180724 of the Practice Guide, to undertake site-specific viability assessment of the strategic sites such as NW62/A)	The Viability Assessment 2018 included appraisals of the emerging allocations including those in excess of 200 units and NW62A (then NW1). The viability report has been updated to support the submission document. The representation is in relation to the supporting evidence. No specific modifications have been suggested and No modifications are required. Conclusion No Change proposed	No	N/A
LPS392	Mrs Raj Bains, Boyer Planning (Richborough Estates)	1.6 Viability Considerations	1.6	To ensure that the proposed policies contained in the Local Plan are deliverable, we strongly suggest further work to support the viability of the proposed Policy NW62/A (SUE) is provided, and that an accurate viability assessment considers the wider infrastructure costs associated with the policy are set out and further determines a sufficient amount of affordable housing.	The allocation is being promoted by a consortium of landowners and developers who have considered specific viability. No specific modification have been suggested and No modifications are required. Conclusion No Change proposed	No	N/A
LPS86	Dr Victoria Holliday	2 Spatial Portrait, Visions, Aims & Objectives	2	The LA should consider a restriction on new houses in coastal villages so they cannot be sold as second or holiday homes, for example through principal residency requirements, and planning permission should be considered for change of use of existing homes from principal residency. Planning permission should be considered for change of use of existing homes from principal residency to second or holiday Homes.	Comments noted. The issue of second homes , principle residency and possible impacts on the housing market and what measures including land use planning could be used to influence and mitigate perceived negative impacts has been investigated by the Council. These matters were fully considered at Overview and Scrutiny committee July 2022 and set out in the impact of second homes report. The Council supports further legislative changes to enable the retention of increased tax revenue collected by 2nd tier authorities along with seeking further legislative changes to request that all second and holiday homes require planning permission. The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. No specific modification have been suggested. No modifications are required. Conclusion No Change proposed	No	N/A
LPS99		2.2 Key Challenges		Development in coastal villages needs to be either designated as principal residency or affordable. Infrastructure needs to precede development.			
LPS362	Mr Edward Witton	2 Spatial Portrait, Visions, Aims & Objectives 3 Delivering Climate Resilient Sustainable Growth Policy SS1	2.0.1 (b), 2.1.3, 2.2.10, 3.0.10, Policy SS1	The strategy of identifying "Growth Villages" should be revisited with a plan to support all villages with a population of over say 500 being viewed from a forward looking perspective to allow them to "thrive and grow" as per the NPPF.	Comments noted. The Council does not consider that the policy needs to be altered. A number of alternative options have been considered in the development of the Plan including a Rural Dispersal Approach and were consulted on previously under policy SD3 – SD3A, B,C,& D. population alone is not an indication of sustainability. No modifications are required Conclusion	No	N/A

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					No Change proposed		
LPS786	Darl Sweetland (Anglian Water)	2.1 Spatial Portrait of North Norfolk 2.2 Key Challenges 2.4 Strategic Aims & Objectives	2.1	<p>Anglian Water supports the Plan Spatial Vision in view of the focus of growth in three towns and the utilisation of existing Infrastructure capacity but suggest a further topic paper to highlight evidence showing that. The predominance of transport as the source of greenhouse gas emissions (2.1.34) would support the spatial distribution of growth in locations which have existing low carbon transport options (2.2.5). Those locations would also be more likely to be served by existing infrastructure and services which would reduce the need for additional grey infrastructure and associated embedded carbon. Focusing growth on sustainable locations also supports efficient investment in resilience and adaptation measures (2.2.2).</p> <p>The paper could include a quantitative assessment of the carbon implications to balance alongside and pros and cons of 'wider countryside' growth as it is not possible to conclude that the 'long-term sustainability of a settlement' has been assessed in the wider context of district wide growth. The Vision's approach of leaving the question of the design of development 'to minimise resource and energy use' bakes in potential growth in the Local Plan which may not be the most sustainable spatial location including the use of existing infrastructure. Whilst bullet points in 1, 2 and 5 in 2.4.1 (1) refer indirectly to the use of existing infrastructure the Vision should include a sequential approach for the Local Plan based on the Sustainability Hierarchy. This approach is set out elsewhere in the plan at 3.0.4, for example but not in the Vision.</p>	<p>Comments noted. This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The Local plan sets the planning framework for the whole district and considers sustainable development across all three strands, Economic, Social and Environment.</p> <p>The Council have carefully considered the distribution of proposed growth having regard to a range of consideration, including the need for development, particularly affordable homes, capacity of places to support growth having regard to key infrastructure, services and environmental constraints. The Plan focuses growth in areas that will maximise the use of existing infrastructure (including water) and will allow infrastructure providers to plan for new facilities in the most efficient way.</p> <p>No specific modification have been suggested. No modifications are required.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS292	Mr Clive Albany	2.1 Spatial Portrait of North Norfolk	2.1	<p>Blakeney (like many other communities) primarily needs social housing to be built not private residences which can be used as business-rated holiday lets which invariably do not pay any local council taxes at all.</p> <p>To make the Local Plan sound and locally credible, NNDC should change its policy immediately and designate all new builds as a primary residence in Coastal villages.</p>	<p>Comments noted. This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district.</p> <p>The issue of second homes , principle residency and possible impacts on the housing market and what measures including land use planning could be used to influence and mitigate perceived negative impacts has been investigated by the council . These matters were fully considered at Overview and scrutiny committee July 2022 and set out in the impact of second homes report. The council supports further legislative changes to enable the retention of increased tax revenue collected by 2nd tier authorities along with seeking further legislative changes to request that all second and holiday homes require planning permission.</p> <p>No specific modification have been suggested. No modifications are required.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS372	Mr Chris Yardley	2.1 Spatial Portrait of North Norfolk	2.1	To remedy the problems identified in the local Plan and its allocation of numbers of dwellings The Plan needs to conduct a water resources assessment of the same type and scope as that provided by East Cambs DC, carry out further impact	Comments noted. This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aim and specific strategic objectives. These have been supported by appropriate and proportionate evidence and	No	N/A

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				assessments on Protected Habitats in relation to disturbance, carry out an assessment of recent population growth in the District to assess where demand is coming from and use this to assess appropriate demand and compare climate change resilience between retaining populations in existing urban areas and translocating them to new urban areas in rural districts. This should then be used to inform the numbers of properties that are provided for the district. If the numbers are currently above those required by Govt assessment this should also be used as a reason to lower numbers required. The stated numbers currently provided (9000) or 11% growth of population in 20 years is clearly not a sustainable figure in relation to the stated aims contained in the Plan.	consulted on and updated in line with feedback as detailed in the Consultation Statement The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The sustainability Appraisal process includes such considerations in its objectives No specific modification have been suggested. No modifications are required. Conclusion No Change proposed		
LPS414	Mrs Raj Bains, Boyer Planning (Richborough Estates)	2.1 Spatial Portrait of North Norfolk	2.1	In response to the Spatial objective - Enabling Economic Growth, we suggest that this includes the need for significant housing growth to help support town centre growth and attract inward investment to support the growth of the District.	Comments noted. The Council does not consider it necessary to amend the aim as requested. Agreed the Plan directs significant levels of residential growth to the larger towns across the District. Conclusion No Change proposed	No	N/A
LPS320	Mr David Spray (Marine Management Organisation)	2.1 Spatial Portrait of North Norfolk	2.1	Although no longer specified under duty to cooperate in online government guidance. para 1.1.5 could refer to the Marine Management Organisation and Marine Plans	Comments noted. The Council does not consider that the duty to co-operate section needs to be altered. There is no need to list all parties in this section of the Plan. Conclusion No Change proposed	No	N/A
LPS121	Mr John Edwards	2.1 Spatial Portrait of North Norfolk	2.1.19	Para. 2.1.19: there needs to be reference to the national significance of the juxtaposition of the sand features (dunes, cusped forelands and spits) and the salt, fresh and brackish water marshes of the AONB in the Heritage and Undeveloped Coast area. It is the location of the largest privately owned National Nature Reserve which forms part of the rapidly developing Holkham Estate visitor attractions.	This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. Information on the Sustainability issues in relation to Biodiversity, Fauna, Flora and Geodiversity informed the setting of the objectives of the Sustainability Appraisal which informed Plan development. No specific modification have been suggested and No modifications are required Conclusion No Change proposed	No	N/A
LPS320	Mr David Spray (Marine Management Organisation)	2.1 Spatial Portrait of North Norfolk	2.1.21	By name a Special Area of Conservation in the Marine Area is mentioned within the plan in addition to other designations with marine relevance. The geographical overlap with the marine area as a coastal authority should be reflected in reference to the East Marine Plans.	Comments noted. This section outlines the contextual information with regard to environment designations. The Council does not consider that the section needs to be altered with a reference to the East marine Plan. Conclusion No Change proposed	No	N/A
LPS786	Darl Sweetland (Anglian Water)	2.1 Spatial Portrait of North Norfolk 2.2 Key Challenges	2.1.22, 2.2.16, 2.2.17	As drafted paragraph 2.1.22 is not as clear as it could be on the relative risks and source(s) of flooding. A table or reference to an evidence document setting out the listed locations, sources of flooding and risks as well as responsibilities – for example on culverts - including developers, would provide a sounder basis for policy. Similar changes could be included in the 2.2.16/ 17	Comments noted This section outlines the contextual information (in this case in reference to flood risk) and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The Plan is supported by an up to date Strategic Flood Risk Assessment which has informed the sustainability Appraisal and site selection and relevant policies. It provides details on all sources of flooding including climate change and surface water and was undertaken through a steering group	No	N/A

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					<p>including Lead local Flood Authority, Environment Agency, Anglia Water and internal Drainage Boards Surface water flooding is the responsibility of Norfolk County Council and the Lead Local Flood Authority</p> <p>No specific modification have been suggested. No modifications are required.</p> <p>Conclusion No Change proposed</p>		
LPS189	Mr Greg Hewitt (Wells Town Council)	2.1 Spatial Portrait of North Norfolk	2.1.26	Suggested that Para 2.1.26 is an inadequate description of (second homes) the position which is common across the District and needs a complete rewrite to explore the issue further and take full account of available evidence. The plan is not justified if it either omits or does not take proper account of relevant evidence.	<p>The Local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The paragraph provides a general overview and context for this issue.</p> <p>No specific modification have been suggested and No modifications are required</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS121	Mr John Edwards			There needs to be reference to the concentration of second and holiday homes in Wells and adjoining villages, at similar if not higher levels to Salthouse (which is referenced), but on a much larger scale. The Local Plan is ineffective in not providing a policy framework to address the issue.			
LPS121	Mr John Edwards	2.1 Spatial Portrait of North Norfolk	2.1.27	Para. 2.1.27: needs to be a reference to Wells and adjoining areas where the median house prices are among the highest in the County and at double the District level (over £500,000 - ONS March 2020). As immediately above, the Plan is ineffective and unjustified in not providing the proper context for planning policy development. Comparator areas include Suffolk, Devon and Cornwall	<p>This section outlines the contextual information and sets out the position in relation to medium house prices across the District. It is recognised there are those that sell above and also those that are sell below.</p> <p>No modifications are required</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS623	Mr Lyndon Swift (Weybourne Parish Council)	2.1 Spatial Portrait of North Norfolk	2.1.9	The Plan needs to recognise the issue of access to hospitals and to avoid building housing that will pull in people from out of the District. The aim should be to meet existing local need, rather than creating additional needs and additional problems.	<p>Comments noted. This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The Local Plan sets the planning framework for the whole district and considers sustainable development across all three strands, Economic, Social and Environment.</p> <p>The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79)</p> <p>No specific modification have been suggested. No modifications are required.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS624	Mr Lyndon Swift (Weybourne Parish Council)	2.2 Key Challenges	2.2.1	The Plan should require landscape and natural environment to take priority over growth. It should recognise the existing need for housing and work for people living in the area, not the arbitrary figure of 9,600 houses.	<p>Comments noted. This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The Local plan sets the planning framework for the whole district and considers sustainable development across all three strands, Economic, Social and Environment. No specific modification have been suggested.</p>	No	N/A

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					<p>The Local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district.</p> <p>Conclusion No Change proposed</p>		
LPS121	Mr John Edwards	2.2 Key Challenges	2.2.11	Para. 2.2.11: the statement is misleading; the high incidence in Wells and district of second and holiday homes (over 37%) is in the market housing sector and any purpose-built holiday accommodation is in addition.	<p>This section outlines the contextual information and sets the scene for the overarching Vision of the Plan along with the Aims and specific strategic objectives. The spatial portrait does references higher levels of second homes in the coastal towns and villages.</p> <p>No modifications are required Conclusion No Change proposed</p>	No	N/A
LPS320	Mr David Spray (Marine Management Organisation)	2.2 Key Challenges	2.2.14	Here coastline and beaches are specifically mentioned in context of tourism and local economic prosperity. Both sectors are encompassed by East Marine Plan Policies (E-TR1, E-TR2, E-EC1, E-EC2, E-EC3). Signposting of Marine Plan Policies would better the policy context of the section.	<p>Comments noted. This section outlines contextual information with regard the importance of tourism and the cost with reference to tourism. The East Marine Plan also recognises the importance of tourism and recreation and seeks to minimise adverse impacts of development on tourism and recreation.</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIN/2.2/01
LPS320	Mr David Spray (Marine Management Organisation)	2.2 Key Challenges	2.2.17	Here Shoreline Management Plans are referred to providing context of current coastal change management. Inclusion of the East Marine Plans would be helpful to demonstrate that the plans have been regarded within the North Norfolk Local Plan	<p>Comments noted modification is proposed for reasons of clarity</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIM/2.2/02
PC002	North Norfolk District Council	2.2 Key Challenges	2.2.7	Update text to reference Glasgow climate pact Cop 26	<p>Modification is proposed for reasons of Factual update</p> <p>Conclusion Agree to requested modification</p>	y	PMIN/2.2/03
LPS320	Mr David Spray (Marine Management Organisation)	2.2 Key Challenges	2.26	Here the National Planning Policy Framework is signposted in relation to national context for climate change action. Similar signposting of the Marine Planning Policy Statement would provide context for marine and coastal activities across a range of sectors with relevance to climate change action and adaptation.	<p>Comments noted. This section outlines contextual information around the role of Planning in addressing climate change and sets out that it is a shared responsibility. The Council does not consider that the section needs to be altered</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS217, LPS156 LPS157	Ms Sarah Mitchell (RSPB) Mr Michael Rayner (CPRE Norfolk)	2.3 Spatial Vision	2.3	<p>We suggest amending slightly 'The overall diversity and quality of North Norfolk's countryside and natural environment will have been maintained and enhanced, and the District's many Conservation Areas and Listed Buildings will have been conserved or enhanced.'</p> <p>Vision for North Norfolk, 3rd Paragraph. The quality of the natural and built environment, the Area of Outstanding Natural Beauty, the Norfolk and Suffolk Broads and their setting will have been protected and enhanced. The overall diversity and quality of North Norfolk's countryside and natural environment will have been maintained (<i>we would add 'and enhanced'</i>)</p>	<p>Agree, the additional wording aligns with the aims of the Plan and specific policy ambitions</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIN/2.3/01

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LPS321 LPS385	Roger Welchman, Armstrong Rigg Planning (Kelling Estate) David Jones, Armstrong Rigg Planning (DL Ritchie Will Trust)	2.3 Spatial Vision	2.3	In order to accord with national policy it is necessary to amend the Local Plan's vision statement on page 19 which needs to propose a vision for 30 years ahead from adoption (i.e. 2053).	Comments noted. It is considered that the Plan provides for 15 years growth, and a policy framework which can be applied over 15 years in the way anticipated in the NPPF. In particular the Plan at para 7.1.10 states that the strategic urban extensions at North Walsham and Fakenham are likely to continue to deliver growth beyond 2036. Conclusion No Change proposed.	No	N/A
LPS78	Mr John Long, John Long Planning (Blue Sky Leisure)	2.3 Spatial Vision	2.3	An additional sentence to reflect the importance of tourism to the North Norfolk Economy along the lines of " ...North Norfolk's tourism sector will be thriving and support will have been given to help the sector deal with coastal erosion, climate change and pandemics etc. and continue to provide appropriate levels of tourist accommodation and diverse attractions throughout the District to meet the needs of residents and visitors alike. " 2 An additional sentence to reflect the need for the Council to provide support for communities and businesses affected by coastal erosion and flooding over the Plan period along the lines of " ...Coastal communities and business affected by coastal erosion and flooding will have been supported by positive planning policies and decisions to enable their adaptation and relocation where necessary to become more resilient to coastal change... ".	Comments noted. The Council does not consider that the aims and objectives of the Plan need to be altered in such a way. The contribution to the economy from the tourist sector is acknowledged throughout the Plan which contains specific policies to support and broaden tourism development as well as coastal management / adaptation. The Vision in particular seeks a diverse and thriving economy. The overarching Vision of the Plan along with the Aims and specific strategic objectives have been consulted on and updated in line with feedback as detailed in the Consultation statement. Strategic Aim 1, Delivering Climate Resilient Sustainable Development includes the need to manage and adapt to the impacts of coastal erosion. Conclusion No Change proposed.	No	N/A
LPS717	Mrs Debbie Mack (Historic England)	2.4 Strategic Aims & Objectives	2.4	Change un-designated to non-designated throughout Plan (objective 2b)	Comments noted modification is proposed for reasons of consistency Conclusion Agree to requested modification	Yes	PMIN/2.4/01
LPS218	Ms Sarah Mitchell (RSPB)	2.4 Strategic Aims & Objectives	2.4	Add additional environmental aim and objective suggestions for over-arching environmental aims and objectives could include: 'Recognising the importance of sustainable development and housing to protect and enhance the area's many international and nationally important designated nature conservation sites.' 'Acknowledging the area's natural and heritage assets and ensuring our policies protect and enhance these features.' 'Using the tools available to us, including biodiversity net gain and Local Nature Recovery Network Strategies, we want to protect and enhance our justifiably famous natural and historic environment at the same time as ensuring growth in a sustainable manner.'	Comments noted The council does not consider that the aims and objectives of the Plan need to be altered in such a specific way. Objective 2a sets out the broad aim. Conclusion No Change proposed	No	N/A
LPS79	Mr John Long, John Long Planning (Blue Sky Leisure)	2.4 Strategic Aims & Objectives	2.4.1	Delivering Sustainable Development objective (section 2.4.1), should be expanded to include provisions for the replacement of businesses at risks from coastal erosion and flooding, not just buildings. For instance text along the lines of " ...Managing and adapting to the impacts of coastal	Comments noted. The Plan includes policies specifically in relation to managing the impacts of climate change and coastal erosion on residential buildings and business's. A modification is proposed for reasons of consistency The council	Yes	PMIN/2.4/02

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				<p><i>erosion and flooding by restricting development in areas where it would expose people and property to risks and facilitating the replacement and relocation of buildings and businesses at risk...</i></p> <p>Blue Sky Leisure considers that the Enabling Economic Growth objective (section 2.4.1) should be expanded to express explicit support for tourism businesses and businesses affected by coastal erosions and flooding, along the lines of "... <i>Promoting and supporting economic growth, especially the tourism sector and diversifying and broadening the economic base of the District, enabling inward investment and supporting the growth of existing businesses, including those affected by coastal erosion and flooding</i>"</p>	<p>Conclusion Agree to requested modification (Part)</p>		
LPS320	Mr David Spray (Marine Management Organisation)	3 Delivering Climate Resilient Sustainable Growth	3.0.10	Here referral to sustainable development as required by the NPPF has been outlined. Similar reference to Marine Plan policies with regard to relevant NNLP policies (e.g. CC2, CC3, ENV3 and ENV4) would demonstrate that marine plans have been regarded within these local plan policies.	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS42 / 95	Dr Victoria Holliday	3.1 Delivering Climate Resilient Sustainable Growth	Policy CC1	Point 2, 'Proposals that accord with policies in the Plan....will be approved after public consultation if no material considerations are raised' i.e add proposals that accord with the plan... <u>must be subject to public consultation.</u>	<p>Comments noted. The NPPF requires that decisions makers approve development proposals that accord with an up-to-date development plan without delay unless material considerations indicate otherwise- consultation on planning applications prior to the determination is not a matter for the Local Plan.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS193	Miss Donna Clark	3.1 Delivering Climate Resilient Sustainable Growth	Policy CC1	The biodiversity enhancement should be a minimum 10% as set out in the Environment Bill.	<p>The Council does not consider it necessary to amend the policy as requested. Policy CC10 covers biodiversity requirements specifically.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS201	Mrs Gemma Harrison, (Holt Town Council)	3.1 Delivering Climate Resilient Sustainable Growth	Policy CC1	Cllrs would like to see point 3 amended to remove the presumption of development. Therefore point 3 could state where no relevant policies exist the NPPF will be relied upon. Rather than planning will be granted unless.	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested. The application of presumption of sustainable development is a requirement of the NPPF and the wording used reflects the requirements of NPPF para 11.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS417	Mrs Raj Bains, Boyer Planning (Richborough Estates)	3.1 Delivering Climate Resilient Sustainable Growth	Policy CC1	To support Policy CC1, we would suggest that further sites such as Land at Paston Gateway, are allocated within the emerging plan to support additional housing growth in the short term in North Walsham	<p>Comments noted The Council does not consider it necessary to amend the policy as requested. The comment does not relate to the policy proposed and largely reiterate points raised in support of alternatives sites. The Plan allocates sufficient sites to address identified needs.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS614	Cllr Nigel Dixon Ward Member for	3.1 Delivering Climate Resilient Sustainable Growth	Policy CC1	The Plan needs to be modified to protect existing natural habitat and migration corridors and integrate new habitat and greater biodiversity gain opportunities into the majority	This overarching policy sets out the local definition and guiding principles of climate resilient sustainable development and adds a local element to the NPPF's presumption to sustainable	Yes	PMIN/3.3/04 PMIN/CC3/02

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	Hoveton & Tunstead (NNDC)			<p>of the proposed sites. It also needs to set higher standards in terms of heat insulation, use of renewables, rain-water capture and use and overall water cycle efficiency. It's acknowledged that huge efforts have been made to comply with the complex and onerous demands of central government while trying to protect the special character of North Norfolk and meet the rapidly rising need to conserve and rebuild biodiversity as well as the climate change agenda. The above, proportionate and complementary, modifications are sought to fill obvious gaps and redress imbalances at both strategic and local grass roots levels to ensure the Local Plan is sound and fit for purpose over the next 15+ years. If it's not possible to incorporate these modifications, then please treat these representations as objections.</p>	<p>development. The policy firmly sets out that tackling climate change is at the heart of the Plan and sets the strategic framework for the many integrated but individual policies that follow. As such the Plan once adopted will provide the Council with the policy base to make appropriate and comprehensive decisions on development proposals that reflect local priorities with regard climate change, and which require a step change in decision making if climate change resilient communities are to be developed whilst respecting and balancing other priorities such as affordable housing provision and ensuring homes offer a reasonable level of residential amenity and quality of life future proving housing. This includes policies that set out the approach to consenting renewable energy, helping to decarbonise the power network, determining the location, scale, mix and character of development to ensure location, density layout, orientation and landscaping make it resilient to climate change impacts and require developments to improve biodiversity, and connectivity through improved green spaces and net biodiversity gain. In addition the Plan sets out a progressive and early requirement for dwellings to reach carbon zero ready through fabric first and then technology approach. These challenging standards have been subject to viability testing and informed by sustainability appraisal and consultation and set a framework to which the industry will need to respond to in a progressive way. The approach is not prescriptive but allows flexibility and choice in how these targets are met in line with national planning policy and also Building regulations. National policy is also evolving with commitments through the Future Homes Standard agenda. The Council will keep these matters under reviewing accordance with the Plan requirement for review every 5 yrs and where there are technological advances. The Plan includes a commitment to set out further detail in an SPD</p> <p>Further clarifications could be brought to the supporting text and policy to ensure developers provide the fullest information and allow officers to monitor progression and improvements.</p> <p>Conclusion Modification(s) proposed for clarity</p>		
LPS661	Ms Laura Joyce (Natural England)	3.1 Delivering Climate Resilient Sustainable Growth	Policy CC1	<p>We recommend consideration of Government's Natural capital tool launched to help protect the environment (https://www.gov.uk/government/news/natural-capital-tool-launched-to-help-protect-the-environment) which is a new online resource for measuring natural capital designed to aid decision making in order to boost and protect natural capital, and Enabling a Natural Capital Approach (ENCA) (https://www.gov.uk/guidance/enabling-a-natural-capital-approach-enca) which provides guidance for policy and decision makers to help them consider the value of a natural capital approach. We advise that natural capital is cross referenced in Policy CC11 due to its relevance to green infrastructure</p>	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested.</p> <p>Natural capital is the sum of our ecosystems, providing us with food, clean air and water, wildlife, energy, wood, recreation and protection from hazards. The natural capital approach makes it easier for public and private organisations to better assess and value the environment. The tool suggested that should be referenced enables land use managers and in particular farmers to protect the countryside through quantifying environmental gain in monetary terms leading to funding opportunities and investment. The guidance states that you should use ENCA resources if you are a government economist or analyst or public sector/ private practitioner interested in understanding the scientific and economic evidence around the natural environment.</p> <p>Conclusion No Change proposed</p>	No	N/A

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PC109	North Norfolk District Council	3.10 Biodiversity Net Gain	3.10.10	Add 'most' and delete 'agricultural' and amend associated footnote as follows: ...the best and most versatile agricultural land.(46) (46) PPG Paragraph: 001 Reference ID: 8-001-20190721 There are five grades of agricultural land...'	Comment noted, modification is proposed to Para. 3.10.10 to add clarity. Conclusion Agree to requested modification.	Yes	PMIN/3.10/03
LPS157	Mr Michael Rayner (CPRE Norfolk)	3.10 Biodiversity Net Gain	3.10.2 3.10.9	3.10.2 We very much welcome this statement, but add that there also must be specific restoration projects funded by other means than coming from new development. We have a proposal for LNRSs that are intertwined with a Nature Recovery Project. 3.10.9 A Nature Recovery Network would be included as a wider policy objective?	Comments noted. The Council does not consider it necessary to amend the supporting text as requested. It is recognised and accepted that development proposals will be one source of funding for nature recovery. The detail of the national policy is still evolving in this area with the Environment Act itself not due to come into effect until 2023. As stated in Para. 3.10.11 the Council intends to produce further guidance through a Supplementary Planning Document. Conclusion No change proposed.	No	N/A
LPS627 LPS628 LPS630 LPS100	Mr Lyndon Swift (Weybourne Parish Council) Dr Victoria Holliday	3.10 Biodiversity Net Gain	3.10.4 3.10.5 3.10.9 Policy CC10	This Plan is not effective without explicitly stating that all biodiversity and climate change rulings apply throughout – to extensions, including those developed via the permitted development route – as well as new houses. The policy should be amended to clarify what 'development' means in relation to this policy e.g. new buildings, extensions and sub-divisions etc.	Comments noted, modification(s) are proposed to add clarity. The detail of the national policy and guidance is still evolving in this area with the Environment Act itself not due to come into effect until late 2023. As stated in Para. 3.10.11 the Council intends to produce further guidance through a Supplementary Planning Document. Detailed national guidance is still awaited, no specific modification has been suggested but the Council recognises that this matter could be clarified. Additional text is proposed around qualifying development and exemptions. Conclusion Agree to requested modification(s) (part)	Yes	PMIN/3.10/01 PMIN/CC10/01
PC112	North Norfolk District Council	3.10 Biodiversity Net Gain	Footnote 41	Update NPPF paragraph references in relation to biodiversity net gain. Add Para. 179(b) and remove paras. 145 and 153	Comment noted, modification is proposed to footnote 41 (in association with Para. 3.10.1). Conclusion Agree to requested modification.	Yes	PMIN/3.10/04
LPS195	Miss Donna Clarke	3.10 Biodiversity Net Gain	Policy CC10	The policy is not effective and is inconsistent with national policy. The policy should be modified so that it is in compliance with the Environment Bill and subsidiary legislation.	The Council does not consider it necessary to amend Policy CC10 as requested. The detail of the national policy is still evolving in this area with the Environment Act itself not due to come into effect until 2023. As stated in Para. 3.10.11 the Council intends to produce further guidance through a Supplementary Planning Document. National guidance is still awaited, no specific modification has been suggested. Conclusion No change proposed.	No	N/A

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LPS631	Mr Lyndon Swift (Weybourne Parish Council)	3.10 Biodiversity Net Gain	Policy CC10	The Plan should include a monitoring and enforcement mechanism. All biodiversity net gain should be required to be maintained for at least the lifetime of the development.	<p>Comment noted. The requirement is enforced by the 2021 Environment Act, which introduced an automatic new condition to every planning permission granted in respect of requiring Biodiversity Net Gain (BNG) of 10%. The approach on monitoring is in line with the Environment Act. The Council does not consider it necessary to amend Policy CC10.</p> <p>Biodiversity net gain is a key indicator that will be monitored as part of the Council's Annual Monitoring Report (AMR). The indicator is included in Section 24- Monitoring Framework where it is envisaged that the percentage of development providing at least 10% biodiversity net gain will be reported on. The Environment Act places further statutory requirements for each Local Planning Authority to report on biodiversity and publish regular Biodiversity Reports (minimum every 5 years) once the Act comes into force and no later than 1st January 2026. National guidance is currently being written by the Planning Advisory Service on what this should entail.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS781	Mr Ziyad Thomas, Planning Issues Ltd (Churchill Retirement Living & McCarthy Stone)	3.10 Biodiversity Net Gain	Policy CC10	<p>That a proportionate and appropriate cost is attributed towards new development achieving a minimum of 10% net gain for biodiversity in the North Norfolk District Council Interim Plan Wide Viability Assessment (2018).</p> <p>We respectfully refer the Council to Table 14 of the DEFRA report entitled Biodiversity net gain and local nature recovery strategies Impact Assessment (2020) advises that the cost of delivering 10% net gain to be circa £18,000 per hectare in the East of England.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy CC10 as requested. Such costs and allowances are reflected in the updated viability study. The future price paid for land should also reflect such national policy considerations.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS810	Mr Steve Kosky, Turley Planning	3.10 Biodiversity Net Gain	Policy CC10	<p>The policy should be amended to provide for the full range of options which are anticipated to be introduced by the Environment Act.</p> <p>In accordance with the Environment Act, Policy CC 10 should be revised to be more flexible, by allowing for new habitat to meet the 10% requirement to be provided either on-site or off-site.</p> <p>The policy should also allow for 10% gain to be achieved via statutory biodiversity credits, when they are brought into effect. The failure to make these changes means that many of the allocation sites identified within the Local Plan may be rendered undeliverable.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy CC10 as requested. Flexibility is built in to the Policy wording and follows the mitigation hierarchy which allows compensation as a last resort.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS503	Mr Mike Jones (Norfolk Wildlife Trust)	3.10 Biodiversity Net Gain	Policy CC10 & Table 1	In order to ensure that the policy is effective, we recommend that in table 1, point 3, reference should be added for clarity that where residual impacts are still unacceptable, for example with residual protected species impacts expected, then BNG will not be accepted.	<p>Comments noted, agree to part modification to add clarity to Policy CC10.</p> <p>The policy is specific to biodiversity net gain. Protected species are included in other policies and specifically Policy ENV4, Biodiversity & Geodiversity.</p> <p>For reasons of clarity, a footnote should be included in the policy to reference the inclusion of the mitigation hierarchy. Add footnote reference to Policy 2.b) to ensure the Mitigation Hierarchy at Table 1 is referenced within the Policy.</p> <p>Conclusion</p>	Yes	PMIN/CC10/02

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					Agree to requested modification (part).		
LPS724	Mrs Debbie Mack (Historic England)	3.11 Green Infrastructure	3.11.4	Reference the role of GI in conserving and enhancing historic environment in paragraph 3.11.4.	<p>Comment noted. The Council does not consider it necessary to amend para. 3.11.4 as requested.</p> <p>The policy justification at Para. 3.11.4 relates to GI in North Norfolk and refers to other related green space policies HC2: Open Space and ENV5: Norfolk GI & RAMS.</p> <p>Conclusion No change proposed.</p>	No	N/A
PC013	North Norfolk District Council	3.11 Green Infrastructure	3.11.9	Update reference to the England Coast Path as currently states completion in 2020.	<p>Comment noted, modification is proposed to Para. 3.11.9 to remove time sensitive text.</p> <p>Paragraph updated to accordance with webpage, Natural England's England Coast Path - Stretch Progress (26th October 2022) coastal-access-england-map.pdf (publishing.service.gov.uk) which states that sections of the Coast Path from Weybourne around to the east of the district is open, but the section west of Weybourne has published proposals but these are not yet approved. Therefore, reference to 2020 completion removed.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/3.11/01
LPS46	Dr Victoria Holliday	3.11 Green Infrastructure	Policy CC11	All developments to include green infrastructure but if they can't they shall pay to enhance green infrastructure either immediately adjacent to site or sustainably accessible.	<p>Comment noted. The Council does not consider it necessary to amend Policy CC11 as requested.</p> <p>The Policy has been informed by the contents of the Green Infrastructure Background Paper and the Norfolk GI & RAMS and is specifically linked to the objectives of the Plan to enhancing the network of accessible green spaces and improving connectivity and health communities. Both of these documents set out a strategic approach towards improving the existing GI network and will ensure the right types of green spaces and access them, will be provided and enhanced where they will provide the greatest benefit. The approach is in addition and complements policy HC2 The provision & retention of Open Space, which sets standards and thresholds for open space</p> <p>Criteria 2 seeks off-site provision to be 'close to the site.' It is considered that it is not feasible to be more specific than this. Being close to a site will also mean that its accessibility will also be sustainable to the local community.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS127	Mrs Gemma Harrison (Holt Town Council)	3.11 Green Infrastructure	Policy CC11	Holt Town Cllrs commented that they would like to see all development deliver GI on-site where possible and if not possible then GI should be delivered as close as reasonably possible to the existing site.	<p>Comment noted. The Council does not consider it necessary to amend Policy CC11.</p> <p>The Policy has been informed by the contents of the Green Infrastructure Background Paper and the Norfolk GI & RAMS. Both of these documents set out a strategic approach towards improving the existing GI network and will ensure the right types of green spaces and access them, will be provided and enhanced where they will provide the greatest benefit.</p>	No	N/A

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					<p>Criteria 2 seeks off-site provision to be 'close to the site.' It is considered that it is not feasible to be more specific than this. Being close to a site will also mean that its accessibility will also be sustainable to the local community.</p> <p>The submitted Holt Neighbourhood Plan adds further local distinction to this policy through policy Holt6, Connectivity in and around Holt</p> <p>Conclusion No change proposed.</p>		
LPS401	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Group & Lovell Partnerships)	3.11 Green Infrastructure	Policy CC11, Criterion 4	<p>Suggested revisions to the wording are set out below.</p> <p>Public Rights of Way(47) and access will be protected and, where practical and feasible, enhanced and promoted. New development should create convenient and attractive links within development and to the surrounding area, assist with creation of a network of accessible greenspace and provide links to public transport and walking and cycling networks.</p>	<p>Comment noted. The Council does not consider it necessary to amend Policy CC11, Criterion 4 as requested.</p> <p>The District's Public Rights of Way are an important strategic green network, which form a key part of existing GI. In accordance with NPPF para. 20d), in particular, strategic policies should make sufficient provision for; conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure....' As such, the criteria to protect, enhance and promote PROWs accords with national policy and is justified and necessary.</p> <p>Conclusion No change proposed.</p>	No	N/A
PC014	North Norfolk District Council	3.12 Trees, Hedgerows & Woodland	3.12.1	Phrasing issue: 'there is a strong local to part play to mitigate'	<p>Comment noted, modification is proposed to Para. 3.12.1 to correct sentence construction.</p> <p>Amend as follows: 'there is a strong local part to play to mitigate...'</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/3.12/01
LPS632	Mr Lyndon Swift (Weybourne Parish Council)	3.12 Trees, Hedgerows & Woodland	3.12.3	In order to be effective the Plan needs to lay out what "exceptional circumstances" are. These do need to be truly exceptional.	<p>Comment noted. The Council does not consider it necessary to amend the text of Para. 3.12.3. as requested.</p> <p>'Exceptional circumstances' cannot be qualified in the manner requested as each site and proposal will raise a different set of circumstances. The text explains that such cases will need to demonstrate that the benefit of the development would outweigh the benefit of preserving the natural features. This would need to be demonstrated on a case by case basis and as such, cannot be defined, as requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS633	Mr Lyndon Swift (Weybourne Parish Council)	3.12 Trees, Hedgerows & Woodland	3.12.5	In order to be effective the Plan needs to specify what counts as "substantiated justification".	<p>Comment noted. The Council does not consider it necessary to amend the text of Para.3.12.5 as requested.</p> <p>A 'substantiated justification' is likely to form part of an Arboricultural Impact Assessment (AIA), which would set out the reasons and justification for proposed works to protected trees. This is discussed in para, 3.12.6. Such reports are produced on a case by case basis. As such, a substantiated justification will be different and as such, cannot be defined, as requested. The 'exceptional circumstances' required I such cases, sets the bar at a high level.</p> <p>Conclusion No change proposed.</p>	No	N/A

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LPS403	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Group & Lovell Partnerships)	3.12 Trees, Hedgerows & Woodland	Policy CC12, Criterion 2	<p>Suggested revisions to the wording are set out below.</p> <p>2. Development that harms or requires the loss of a protected tree, hedgerow or woodland(i) will only be permitted in exceptional circumstances where the public benefit of the development would clearly outweigh the loss or deterioration of any tree, hedgerow or woodland. In such circumstances, adequate replacement provision, taking account of size, comparable biomass and suitable native species for the location, will be required.</p> <p>To ensure compliance with Paragraph 35(c) of the NPPF, the requirement for replacement planting to be of 'comparable biomass' and of a 'comparable size' should be erased from the policy. The process of calculating/quantifying biomass can prove ambiguous, and site constraints may determine that replacement planting of a comparable size proves undeliverable.</p> <p>Retaining these elements within the policy risks rendering the policy ineffective, so they should be erased to ensure compliance with Paragraph 35(c) of the NPPF.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy CC12, Criterion 2 as requested. However, it is acknowledged that reference to 'native' species does not allow for any future proofing in relation to climate change, as this process is likely to alter what species is appropriate. As such, reference to native species in Criterion 1 and 2 will be amended to state a preference for 'appropriate native species' to add long term flexibility.</p> <p>Conclusion Agree to requested modification (part).</p>	Yes	PMIN/CC12/01
LPS432	Jake Lambert, Bidwells (Hopkins Homes)						
LPS459	Jake Lambert, Bidwells (Broadland Housing Association)						
LPS476	Jake Lambert, Bidwells (Crisp Malting Group)						
LPS635	Mr Lyndon Swift (Weybourne Parish Council)	3.12 Trees, Hedgerows & Woodland	Policy CC12, Criterion 3	<p>The Plan does not specify how this overriding benefit is to be judged. There is no way of knowing from this vague statement whether this would comply with national policy.</p> <p>The Plan needs to be explicit, leaving no ambiguity for planning officers.</p>	<p>Comment noted. The Council does not consider it necessary to amend criterion 3 of Policy CC12 as requested.</p> <p>Criterion 3 aligns with national policy (NPPF para. 180c) and guidance (PPG Natural Environment section, Paragraphs 033, 034). Each planning application will be assessed on a case by case basis, where a submitted Arboricultural Impact Assessment will provide the necessary evidence for consideration. No specific modification requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
PC116	North Norfolk District Council	3.13 Protecting Environmental Quality	3.13.5 Policy CC13	<p>Update supporting text to explain requirement to demonstrate Nutrient Neutrality under the Habitat Regs and add new policy requirements to Policy CC13 to relation to addressing Nutrient Neutrality within the designated catchments of the River Wensum and the Norfolk and Suffolk Broads</p>	<p>In order to meet the legal requirements of the Habitat Regulations, development proposals which include an increase in overnight accommodation, in the identified catchment zones, will need to demonstrate Nutrient Neutrality.</p> <p>Modification proposed for factual updates and to ensure Nutrient Neutrality is addressed in relevant proposals.</p> <p>Add additional text after 3.13.5, new policy criteria in CC13 and update section paragraph numbering as a consequence.</p> <p>Conclusion Agree to suggested modification(s)</p>	Yes	<p>PMIN/3.13/01</p> <p>PMIN/CC13/01</p> <p>PMIN/3.13/02</p>
LPS336	Miss Natalie Beal (Broads Authority)	3.13 Protecting Environmental Quality	3.13.8	<p>Proposed change</p> <p>The Norfolk Coast Area of Outstanding Natural Beauty Partnership states as part of its 20 year vision that "the area</p>	<p>Comment noted, modification is proposed to Para. 3.13.8 to add further clarity.</p> <p>Conclusion</p>	Yes	PMIN/3.13/01

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				will still be essentially unspoilt with a strong feeling of remoteness, peace and tranquillity, with wide skylscapes, seascapes and dark night skies that show the richness and detail of constellations.” (53) The Broads Authority also has intrinsically dark skies that are protected through its Local Plan. 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 using sensitive design details, for example, to avoid large glazed areas.	Agree to requested modification.		
LPS636	Mr Lyndon Swift (Weybourne Parish Council)	3.13 Protecting Environmental Quality	3.13.8	In order to be effective this para needs to include the CPRE lighting clause, and reference to “right light, right place, right time”.	<p>Comment noted. The Council does not consider it necessary to add text as requested to Para. 3.13.8. The CPRE quote does not add any further clarity to the paragraph. The plan adequately references national technical best practice and also links to the Design Guide SPD which can be updated in relation to external lighting in the future.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS337	Miss Natalie Beal (Broads Authority)	3.13 Protecting Environmental Quality	Policy CC13 Criterion 1 (e)	Proposed change to Policy CC13 (1) (e) Change to: ‘e) the dark skies of the area, through addressing light pollution and noise pollution’	<p>Comment noted. The Council does not consider it necessary to amend Policy CC13 Criterion 1e) as requested.</p> <p>Criterion 1e) is intended to relate to any potential light and noise pollution across the district and it is considered imperative to the operation of the Policy to remain so. Criterion 3 refers to the matter of dark skies, in accordance with NPPF para. 185c).</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS637	Mr Lyndon Swift (Weybourne Parish Council)	3.13 Protecting Environmental Quality	Policy CC13	The Plan needs to specify in what circumstances the benefits would outweigh the adverse impact.	<p>Comment noted. The Council does not consider it necessary to amend Policy CC13 as requested.</p> <p>The impacts of all forms of pollution will be assessed on a case-by-case basis and balanced against the benefits of a proposal. As such the circumstances will vary for each case and cannot be standardised as requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS638	Mr Lyndon Swift (Weybourne Parish Council)	3.13 Protecting Environmental Quality	Policy CC13	The Plan needs to specify what an acceptable level of disturbance is. In fact, it is our view that the word “tranquillity” implies no disturbance. The AONB’s characteristics are tranquillity and remoteness, both of which would be damaged by development within the area.	<p>Comment noted. The Council does not consider it necessary to amend Policy CC13 as requested.</p> <p>The impacts of all forms of pollution, including tranquillity, will be assessed on a case-by-case basis and balanced against the benefits of a proposal. As such the circumstances will vary for each case and cannot be standardised as requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS756	Ms Susie Cunningham (Catfield Parish Council)	3.13 Protecting Environmental Quality	Policy CC13	Catfield Parish Council recommend that the “Plan” be amended to recognise fully the role of North Norfolk District Council in protecting the Broads and how it intends to work more closely with the Broads Authority to that end.	Comment noted. The Council recognises the importance of its role in protecting The Broads. As such, various modifications have been in the plan which make reference to The Broads where considered relevant.	No	N/A

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					<p>Conclusion No change proposed.</p>		
LPS674	Ms Laura Joyce (Natural England)	3.13 Protecting Environmental Quality	Policy CC13 Policy ENV6	<p>In line with paragraphs 174 and 185 of the NPPF, and the plan's HRA, we advise that the policy addresses the impacts associated with new development on European sites and SSSIs, particularly nitrogen emissions as result of increased traffic generation and air quality and pollution concerns during construction. We recommend that Policy ENV6 is referenced in Policy CC13 to ensure air quality and pollution concerns are addressed.</p> <p>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, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.</p>	<p>Comment noted. The Council does not consider it necessary to reference Policy ENV6 as requested. Policy ENV6 relates to the maintenance, protection and promotion of amenity for existing and future occupants in relation to the criterion.</p> <p>The Plan has been subject to Habitat Regulation Assessment (HRA) The findings of the HRA on the Local Plan have been used as an integral and iterative part of relevant policy formation. Air Quality is an issue for many European sites, Es across England and increase traffic on roads could be a concern. The HRA for North Norfolk mapped the road sections that fell within 200m of the Es in line with Natural England guidance and concluded that given the dispersed nature of the allocations, LSE could be ruled out, alone and in combination agree but we've done it in HRA</p> <p>The proposals will be assessed against the local plan and the development frameworks as a whole and should be taken as a whole.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS337	Miss Natalie Beal (Broads Authority)	3.13 Protecting Environmental Quality	Policy CC13, Criterion 3	<p>Proposed change CC13 (3)</p> <p>'Proposals for development should must minimise the impact on tranquillity and dark skies in North Norfolk and the adjoining Authorities' areas'.</p>	<p>Comment noted. The Council does not consider it necessary to amend Policy CC13, Criterion 3 as requested.</p> <p>The policy at criterion 1 states 'that proposals will avoid, minimise and take every opportunity to reduce e. light and noise pollution. Criterion 3 reinforces this with specific reference to the wider characteristics and values of the AONB and setting of the Broads.</p> <p>The wording accords with the NPPF para. 185c), which states '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.</p> <p>In doing so they should: c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.'</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS337	Miss Natalie Beal (Broads Authority)	3.13 Protecting Environmental Quality	Supporting text	<p>Proposed change to supporting text</p> <p>Information should be added to the supporting text to explain what the Council expects an applicant to do to show how they have addressed impact on dark skies.</p>	<p>Comment noted. The Council does not consider it necessary to amend the supporting text as requested.</p> <p>The mitigation of light pollution, along with other forms of pollution, will be assessed on a case-by-case basis and the details required are likely to vary accordingly. As such, the submission of set details would be too prescriptive. Guidance regarding The matter of light pollution is well documented in the PPG and it is likely that the Council's updated Design Guide SPD will provide additional guidance in this regard.</p>	No	N/A

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					<p>Conclusion No change proposed.</p>		
LPS237	Mr Michael Rayner (CPRE Norfolk)	3.13.Protecting Environmental Quality	3.13.7 3.13.8 3.13.9 Policy CC13	Applaud NNDC for seriously addressing the issue of light pollution but given draft form of emerging Design Guide, we attach CPRE Norfolk's position statement on light pollution to assist NNDC in adding detail to these policies and supporting text, or outside of this Regulation 19 consultation process, to their emerging new Design Guide.	<p>Comment noted. No specific modification proposed. The Council does not consider it necessary to amend the supporting text and Policy as requested.</p> <p>With regard to the supporting information for Light and Noise Pollution, Para. 3.13.9 states that along with the national advice offered in the PPG, there is specific guidance and information set out in the North Norfolk Landscape Character Assessment SPD, which was adopted in January 2021, which will be used to inform decision making.</p> <p>The Council's existing Design Guide SPD will be updated in due course, with the matter of light and noise pollution being material considerations within the document.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS320	Mr David Spray (Marine Management Organisation)	3.2 Renewable & Low Carbon Energy	3.2.10	Reference to national frameworks and LPA charters around renewable energy and low carbon development. Highly relevant to East Marine Plan Policies E-CC1, E-CC2, E-EC3 and E-WIND2. WIND2 connects to supporting infrastructure to offshore wind energy development and hence has relevance to landfall sites and cabling infrastructure. Reference to the marine plan in a similar fashion to other documents (3.2.10 – The Ten Point Plan for a Green Industrial Revolution for example) and frameworks in this section would demonstrate to the inspectorate that marine plans have been regarded.	<p>Comment noted, part modification is proposed to Para. 3.2.10, to add further clarity relating to the consideration of the UK Marine Policy Statement and the relevant policies of the East Marine Plans.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/3.2/09
LPS40	Ms Sarah Mitchell (RSPB)	3.2 Renewable & Low Carbon Energy	3.2.11	Paragraph 3.2.11. Suggest amending wording of final sentence to state 'it is not of high environmental value and adverse impacts on biodiversity can be ruled out.'	<p>Comment noted. The Council does not consider it necessary to amend Para. 3.2.11. The text relates to PPG Paragraph: 013 Reference ID: 5-013-20150327 and as such, it is considered to accurately reflect national guidance.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS148	Mr Michael Rayner (CPRE Norfolk)	3.2 Renewable & Low Carbon Energy	3.2.11	Requests inclusion/ further explanation of: Best and most versatile land - NPPF para. 174b and footnote 58 (para. 175)	<p>Comment noted, modification proposed to Para. 3.2.11 relating to the need to use poorer quality agricultural land, in preference to higher quality agricultural land.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/3.2/04
LPS40	Ms Sarah Mitchell (RSPB)	3.2 Renewable & Low Carbon Energy	3.2.6	Paragraph 3.2.6. Policy CC2 does include nationally and internationally important sites, so including nationally and internationally important sites (SSSI, SPA, SAC and Ramsar) in 3.2.6 would aid completeness and consistency.	<p>Comment noted. The Council does not consider it necessary to amend Para. 3.2.6. The text refers to spatial aspects of landscape sensitivity, where the following para. 3.2.7 confirms that 'all proposals will be assessed against a comprehensive set of criteria.' The criteria subjects are covered in much greater detail in other policies, for example, Policy ENV4: Biodiversity & Geodiversity.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS334	Miss Natalie Beal (Broads Authority)	3.2 Renewable & Low Carbon Energy	3.2.6	Para 3.2.6 Needs to include reference to The Broads. 'Careful consideration will also be needed in areas close to high	<p>Comment noted, modification proposed to Para. 3.2.6 for reasons of clarity.</p>	Yes	PMIN/3.2/02

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				sensitivity landscapes, such as the AONB, the Broads, Heritage Coast and Undeveloped Coast and the cumulative impacts of an increasing number of renewable developments within an area.	Conclusion Agree to requested modification.		
LPS40	Ms Sarah Mitchell (RSPB)	3.2 Renewable & Low Carbon Energy	Figure 5	Figure 5, Wind Energy Areas, page 31 - would be easier to follow if settlements are shown in different colours, as used in figure 6.	Comment noted, alternative modification proposed to Figure 5 for reasons of clarity. The use of the settlements in Figure 5 is only for use as locators for geographic orientation. An alternative suggestion is proposed to change the map legend word 'Settlement Hierarchy' to 'Key Settlements'. Conclusion Agree to requested modification.	Yes	PMIN/3.2/01
LPS334	Miss Natalie Beal (Broads Authority)	3.2 Renewable & Low Carbon Energy	Figure 5	Figure 5. Needs to show the Broads Authority (BA) boundary.	Comment noted, modification proposed to Figure 5. Conclusion Agree to requested modification.	Yes	PMIN/3.2/03
LPS334	Miss Natalie Beal (Broads Authority)	3.2 Renewable & Low Carbon Energy	Figure 5	At Figure 5, the size of wind turbines set out as small, medium and large are bigger than those within the BA Landscape Sensitivity Study (BALSS), so the NNDC policy could theoretically allow 60m high turbines close to the BA boundary, which would be a concern. BALSS Figure 4.3: Wind Turbine Sensitivity; Medium Turbines (20 - 50m) shows all but 2 Landscape Character Areas (LCAs) (on Norwich fringe) as having High sensitivity. Fig 4.4 Wind Turbine Sensitivity; Large Turbines (50- 70m) shows all LCAs as having High sensitivity. It is suggested to either pull the blue area away from the Broads boundary or introducing a 'buffer zone' along the Broads/NNDC boundary where perhaps a different more stringent policy approach could be applied.	Comment noted. The Council does not consider it necessary to amend Figure 5 as requested. The policy wording at 2b. provides the necessary protection and flexibility required without the need for a buffer zone, which would be inflexible and would not take account of a range of relevant considerations, such as topography (see PPG Para: 008 Reference ID: 5-008-20140306). It is considered that the Policy addresses harm irrespective of the size of a proposed wind turbine. Conclusion No change proposed.	No	N/A
LPS148	Mr Michael Rayner (CPRE Norfolk)	3.2 Renewable & Low Carbon Energy	Policy CC2	Policy CC 2, add a point or clause which specifically prevents solar farms from being permitted on Best and Most Versatile (BMV) land.	Comment noted. The Council does not consider it necessary to add an additional clause as proposed. Additional text is already proposed at 3.2.11 to add clarity with regards Best and Most Versatile land in the PPG. There is no absolute presumption against any renewable proposals within national policy and guidance and as such, the policy is considered to accurately reflect the balanced approach taken. Conclusion No change proposed.	No	N/A
LPS148	Mr Michael Rayner (CPRE Norfolk)	3.2 Renewable & Low Carbon Energy	Policy CC2	In relation to onshore wind turbines, to follow NPPF footnote 54 fully, add following phrase at the end of Policy point 3: 'and the proposal has their backing'.	Comment noted. The council does not consider it necessary to amend the Policy as requested. Whilst it is agreed that the NPPF para. 158b) with footnote 54 seeks the backing of the local community, the Policy in requiring that proposals fully address the concerns of a local community, would implicitly require this. There is no absolute presumption against any renewable proposals within national policy and guidance and as such, the policy is considered to accurately reflect the balanced approach taken. Conclusion	No	N/A

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					No change proposed.		
LPS125	Mrs Gemma Harrison (Holt Town Council)	3.2 Renewable & Low Carbon Energy	Policy CC2	No modification requested. Comment: Holt Town Councillors raise concerns that even low sensitivity areas need careful consideration in regard to on-shore wind turbines.	Comment noted. The Council does not consider it necessary to amend the Policy as proposed. The Council's approach to renewable energy technology has been informed by a Landscape Sensitivity Assessment (2021) in line with the PPG and NPPF. As such, the Policy is considered to provide more certainty and is positively worded, which also aligns with the Council's Climate Emergency Declaration and Environmental Charter. No specific modification suggested. Conclusion No change proposed.	No	N/A
LPS43	Dr Victoria Holliday	3.2 Renewable & Low Carbon Energy	Policy CC2	Reword Point 2: 'proposals for renewable technology.... will be supported if the landscape is undesignated and not sensitive....'	Comment noted. The Council does not consider it necessary to reword Policy CC2, point 2 as proposed. The Council's approach to renewable energy technology has been informed by a Landscape Sensitivity Assessment, LSA 2021) being one of the recommended approaches in the PPG, that provides more detail and therefore clarity than the wording suggested. The sensitivity areas identified in the LSA already take account of the special features of the landscape. Conclusion No change proposed.	No	N/A
LPS194	Miss Donna Clarke	3.2 Renewable & Low Carbon Energy	Policy CC2	Fails to reflect emerging national energy policy. The Plan should be consistent with the emerging national energy policy with respect to renewable energy and the issues to be considered. Note the emerging policy says that where the local plan is silent the fallback is national energy policy.	Comment noted. The Council does not consider it necessary to reword Policy CC2. The Plan and Policy CC2 are considered to be in alignment with national planning policy and guidance, as well as reflecting the government's commitment to achieve carbon net zero by 2050 and the Council's adoption of an Environmental Charter with regards to renewable and low carbon energy. Conclusion No change proposed.	No	N/A
LPS202	Mrs Gemma Harrison (Cley Parish Council)	3.2 Renewable & Low Carbon Energy	Policy CC2	Cley Councillors request removal of sensitivity levels for wind turbine development in the policy and amended to ensure all applications are dealt with on a case by case basis.	Comment noted. The Council does not consider it necessary to amend Policy CC2 as proposed. The Policy is considered to align with national policy and guidance, as well as reflecting the government's commitment to achieve carbon net zero by 2050 and the Council's adoption of an Environmental Charter with regards to renewable and low carbon energy. The approach has been formed and tested through consultation and the policy provides greater certainty for wind energy proposals but also requires satisfactory mitigation in relation to a list of criteria, which provides the necessary consideration of sensitive landscapes and heritage assets. Conclusion No change proposed.	No	N/A
LPS499	Mr Mike Jones (Norfolk Wildlife Trust)	3.2 Renewable & Low Carbon Energy	Policy CC2	Recommend that the policy is modified to include targets for renewable energy provision in all new development (for example, for a percentage gain as per the Merton rule), either on-site or via a collective off-site aggregation of delivery.	Comment noted. The Council does not consider it necessary to amend Policy CC2 as proposed. Policy CC2 relates to the development of renewable energy technology infrastructure, and is not intended to cover requirements for all forms of development. Suggested modification covers matters that are addressed through other specific policies, e.g. Policy CC3 Sustainable Construction, Energy Efficiency & Carbon Reduction, where a progressive approach is set out in line with government and local expectations. Conclusion	No	N/A

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					No change proposed.		
LPS662	Ms Laura Joyce (Natural England)	3.2 Renewable & Low Carbon Energy	Policy CC2	<p>Support the need to demonstrate no likely significant effects on the qualifying features of designated sites.</p> <p>Recommend a project level HRA where a proposal is likely to constitute a significant effect, both within the boundary of the designated site, and any land that may be functionally linked.</p> <p>A LVIA may also be required where a proposal is situated in or within proximity to the Norfolk Coast AONB to ensure that any impacts to the special qualities of this protect landscape are fully assessed.</p> <p>Marine Conservation Zones should be evaluated where necessary. Strongly advise that projects likely to negatively impact the Cromer Shoal MCZ are avoided.</p>	<p>Support and comments noted. The Council does not consider it necessary to amend Policy CC2 as proposed.</p> <p>The matters raised largely relate to potential documents required for validation of a planning application. A LVIA is a requirement in relation to Policies ENV1 and ENV2, which would be a relevant supporting document for a renewable energy proposal.</p> <p>Other proposed amendments refer to the wider approach to the assessment of renewable energy infrastructure and in particular, to wind turbines, with regards to the UK Marine Policy Statement and the relevant policies of the East Marine Plans.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS721	Mrs Debbie Mack (Historic England)	3.2 Renewable & Low Carbon Energy	Policy CC2 & Figure 5	<p>Include consideration of heritage assets and their setting in development of Wind Energy Map (Figure 5) and amend figure accordingly.</p> <p>Alternatively, delete figure 5 and provide greater reference to heritage assets and settings in the policy and supporting text.</p> <p>If the map remains, we would expect additional text on the map to make it clear that detailed assessment has not been undertaken in relation to heritage assets and their settings with corresponding supporting text in the Plan (see policy CC1, Supporting Text and Policies Map of North West Leicestershire Local Plan where this has been done).</p>	<p>Comment noted. The Council does not consider it necessary to amend Figure 5 as proposed, given the strategic nature of Figure 5. Designated heritage assets are identified on the Policies Map. Heritage assets and their settings are adequately considered at point 2b of the criteria-based element of the Policy. The map is considered to be an important element of the Policy to provide greater certainty for opportunities for renewable energy development.</p> <p>However, it is considered that the footer description of Figure 5 is amended to clarify what the map is representing, rather than what it is not: Figure 5 Wind Energy Areas (based on Landscape Sensitivity Assessment SPD 2021).</p> <p>Conclusion Agree to alternative modification.</p>	Yes	PMIN/3.2/05
LPS789	Mr Darl Sweetland (Anglian Water)	3.2 Renewable & Low Carbon Energy	Policy CC2	<p>CLARIFICATION: Whilst the support for renewable energy is welcome (3.2.1 to 3.2.9 and 3.2.11 to 3.2.15) it is not clear if low carbon energy projects at existing developed infrastructure sites, such as wastewater recycling centres would be considered sustainable development (Policy CC2) with a higher level of policy support? Development of renewable energy infrastructure at these sites also increases their resilience to local and wider impact of climate change which the plan observes will become more severe and frequent.</p>	<p>Comment noted. The Council does not consider it necessary to amend Policy CC2 as proposed.</p> <p>The Policy wording is considered to be clear at Criteria 2 that any new renewable energy scheme and the integration of such technology on existing or proposed infrastructure, will be supported where the proposals would meet the locational and/or criteria based matters. The Policy does not specifically refer to sustainability as a criteria, given the nature of such proposals.</p> <p>No specific modification has been suggested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS619	Alicia Hull & Peter Crouch	3.2 Renewable & Low Carbon Energy	Policy CC2	<p>Comment. The Policy is unambitious and seems more in tune with the hostility to wind turbines within the Council, than with the declaration to combat climate change.</p> <p>Ruling out the AONB is unnecessary and will prevent projects, including community turbines.</p>	<p>The Council does not consider it necessary to amend Policy CC2 as proposed.</p> <p>The Policy is positively worded and promotes the development of renewable energy technology, including community-led initiatives, whilst protecting sensitive landscape character types and heritage assets. With this context in mind, it is considered that the Policy will allow the Council to make the fullest contribution towards minimising greenhouse gas emissions. In addition, Policy SS3:</p>	No	N/A

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				The Policy conflicts with the stated ambition to make 'the fullest contribution towards minimising greenhouse gas emissions'. NNDC should encourage turbines, especially community owned ones which will add to the local economy.	Community-led development specifically supports renewable energy generation, where it contributes positively to the vitality and viability of the community. No specific modification has been suggested. Conclusion No change proposed.		
LPS334	Miss Natalie Beal (Broads Authority)	3.2 Renewable & Low Carbon Energy	Policy CC2 Criterion 1	Policy CC2, 1 remove para 1 or combine with para 2.	Comment noted. The Council does not consider it necessary to remove point 1 of Policy CC2. Point 1 sets out the strategic approach of the policy, which is caveated to take account of the wider environmental, social and economic benefits of renewable energy. Conclusion No change proposed.	No	N/A
LPS334	Miss Natalie Beal (Broads Authority)	3.2 Renewable & Low Carbon Energy	Policy CC2 Criterion 2(b)	Policy CC2, 2.b. add 'and character' to point to read, the special qualities and character of all designated nationally important landscapes and heritage assets including their settings.	Comment noted. The Council does not consider it necessary to amend Policy CC2, 2b. The term 'special qualities' is considered to adequately incorporate 'the character' of the designated assets within the criterion. Conclusion No change proposed.	No	N/A
PC005	North Norfolk District Council	3.2 Renewable & Low Carbon Energy	Policy CC2, Criterion 2 (f)	Change 'is' to 'are' and pluralise 'mechanism' or take the 's' off 'details'	Comment noted, modification is proposed to correct grammar. Conclusion Agree to requested modification.	Yes	PMIN/CC2/08
PC003	North Norfolk District Council	3.2 Renewable & Low Energy Carbon	3.2.2	Replace 'Framework' with NPPF at beginning of paragraph.	Comment noted, modification is proposed to provide consistency throughout the document. Conclusion Agree to requested modification.	Yes	PMIN/3.2/06
PC004	North Norfolk District Council	3.2 Renewable & Low Energy Carbon	3.2.5 3.2.9 Figure 5	Clarification as to the definition of small, medium and large scale wind energy?	Comment noted, modification is proposed to Para. 3.2 9 to add clarity to the plan by setting out the size details of the small, medium and large wind turbines within the Onshore Wind Energy section at Para. 3.2.9. Conclusion Agree to requested modification.	Yes	PMIN/3.2/07
PC007	North Norfolk District Council	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	3.3.2 3.3.6	In December 2021, the Government announced that from June 2022, the Building Regulations will be changed to reflect increased targets for CO2 emissions from new build home. Update para 3.3.2 and 3.3.6 to reflect this	Modifications is proposed for reasons of Factual update Conclusion Agree to requested modifications		PMIN/3.3/01 PMIN/3.3/02
LPS398 LPS428	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Group & Lovell Partnerships) Mr Jake Lambert, Bidwells (Hopkins Homes)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Revise Policy CC3 to reduce the required reduction in CO2 emission to a level that is justified by evidence, and demonstrated to be deliverable in practice eg 19% decrease only	The policy is in line with the national ambitions and Building Regulations as well as the Council's aspirations and goals and sets a positive framework as required by the NPPF. No specific modification have been suggested. No modifications are required. Conclusion No Change proposed	No	N/A

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LPS457	Mr Jake Lambert, Bidwells (Broadland Housing Association)						
LPS353	Mr Allen Presslee, Cornerstone Planning Limited (Norfolk Homes Ltd)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Part 2 of Policy CC3 is superfluous. Its provisions seeks to duplicate what is required of house builders under the Building Regulations, and so this part of the policy appears unnecessary	Comments noted. The Council does not consider it necessary to amend the policy as requested the compliance statement is required in order to inform decision making. No modifications are required Conclusion No Change proposed	No	N/A
LPS501	Mr Mike Jones (Norfolk Wildlife Trust)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Policy is upgraded to a more ambitious zero carbon targets, with consequent benefits for climate change targets and therefore also Norfolk's wildlife.	Comments noted. The approach is aligned to national policy and the direction of travel as outlined in the Future Homes Standard and now through Building Regulations. The policy sets a minimum standard and sets a positive policy framework that seeks a progressive betterment than the minimum. No specific modification have been suggested Conclusion No Change proposed	No	N/A
LPS474	Mr Jake Lambert, Bidwells (Crisp Malting Group)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	The requirement for commercial developments of over 250sqm to meet BREEAM 'Very Good' standards should be reconsidered for the reasons the potential impact on the rural economy.	Comments noted. The Council does not consider that the policy needs be modified in this way. The policies have been informed by the Council viability study. Conclusion No Change proposed	No	N/A
LPS487	Mr Mark Singer, Barton Wilmore (Sutherland Homes)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Objective of progressive carbon reduction in policy CC3 is supported however the response seeks clarification on the council's intensions around dwellings being Zero carbon ready by 2035. The Viability Assessment should assess the impact of the 2035 zero carbon ready requirement to ensure it is deliverable. In our view, it would be more appropriate to just refer to aligning with Building Regulations as they change.	Comments noted. The Council does not consider it necessary to provide further clarification. The approach is clearly stated to align with Government ambition to ensure technology installed in homes and work places will be low carbon which when combined with the decarbonisation of the power system set for 2035 will enable development tin North Norfolk to positively contribute to governments legally binding reduction in Green House gas emissions. Policy requirement is subject to appropriate viability and technical considerations and reflects the need for progressive improvement. Conclusion No Change proposed	No	N/A
LPS497	Mr Raven Cozens-Hardy	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Include in the Plan - mention of the national planning guidance, known as Paragraph 79, which allows the building of architecturally outstanding carbon zero homes in rural areas.	Comments noted. The Council does not consider it necessary to amend the strategic policy as requested. The comment does not relate specifically to the policy proposed and covers matters that are addressed though other specific policies across this Plan and the NPPF which are taken as a whole Conclusion No Change proposed	No	N/A
LPS722	Mrs Debbie Mack (Historic England)	3.3 Sustainable Construction, Energy	Policy CC3	Policy CC3 does not provide for the particular circumstances that apply of the historic environment. Criteria should be added to the policy to address this.	Comments noted. The Council does not consider it necessary to amend the policy as requested. The comment does not relate specifically to the strategic policy proposed and covers matters	No	N/A

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		Efficiency & Carbon Reduction			that are addressed though other specific policies across this Plan such as ENV8 High Quality Design and ENV7 Protecting and Enhancing the Historic Environment Conclusion No Change proposed		
LPS767	Mr Mark Behrent (Home Builders Federation)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Given the shift to securing improvements in energy efficiency is through mandatory building regulations which will be introduced in the summer of 2022 we would suggest that policy CC3 is inconsistent with national policy and should be deleted.	Comments noted. The approach is aligned to national policy and the direction of travel as outlined in the Future Homes Standard and through Building Regulations. The policy sets a minimum standard and sets a positive policy framework that seeks a progressive betterment than the minimum. No specific modification have been suggested Conclusion No Change proposed	No	N/A
LPS779	Mr Ziyad Thomas, (Planning Issues Ltd Churchill - Retirement Living & McCarthy Stone)	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	We would therefore recommend that sub clause 1 is amended to read as follows: <i>New build residential development, including replacement dwellings, must achieve reductions in CO2 emissions in accordance with the most current requirements of Part L and Part of the Building Regulation, This should be achieved through.....</i>	Comments noted. The approach is aligned to national policy and the direction of travel as outlined in the Future Homes Standard and now through Building Regulations. The policy sets a minimum standard and sets a positive policy framework that seeks a progressive betterment than the minimum. No specific modification have been suggested Conclusion No Change proposed	No	N/A
PC010	North Norfolk District Council	3.3 Sustainable Construction, Energy Efficiency & Carbon Reduction	Policy CC3	Clarification Criterion 1 uses 'must' and criterion 2 uses 'should'.	Modifications is proposed for reasons of consistency Conclusion Agree to requested modification	Yes	PMIN/CC3/01
LPS02	Mr Mike Jones (Norfolk Wildlife Trust)	3.4 Water Efficiency	Policy CC4	We support the inclusion of this policy and in particular, as depending on where the water is sourced, it can result in negative impacts on sensitive wetland habitats. We also support the inclusion in the policy to 'aspire beyond these ratings where possible'.As the policy is currently worded, we believe there would be no requirement for development to meet higher water efficiency ratings than those initially set, even if technology and industry best practice make higher efficiencies viable and easily deliverable. Therefore, in order to support delivery of this aspiration, additional wording should be added to commit the Council to regular review of the policy over the plan period.	Comments noted. The Council does not consider it necessary to amend the policy as requested. The approach is aligned to the Duty to Co- operate agreement and statement of Common Ground and supported by Anglian Water.(LPS790) who consider the that "the policy seeks to require all development to meet or exceed the current 110l/p/p/d standard in the Regulations and to higher standards as these are introduced by Government." The NPPF, Para 33 stipulates that Plans and policies be reviewed at least once every five years. Conclusion No Change proposed	No	N/A
LPS320	Mr David Spray (Marine Management Organisation)	3.5 Coastal Change Management	3.5.4	Reference Government responses and strategies could be bolstered with reference to Marine Plans in the context of reduced carbon emissions for marine and coastal developments (East plan policy E-CC2) – this marine plan policy has relevance to Local Plan Policy CC3.	Comments noted. This section outlines the contextual information with regard the Council's ambition No specific modification have been suggested. No modifications are required. Conclusion No Change proposed	No	N/A
LPS80	Mr John Long, John Long Planning Ltd (Blue Sky Leisure)	3.5 Coastal Change Management	Policy CC5	Modifications requested to make the Policy more effective and justified by adding further point after point 5 to explicitly support existing tourist accommodation businesses operating	Comments noted. The Council does not consider it necessary to amend Policy CC5, as requested. The policy is positively worded and aligns with the NPPF and PPG. Criterion 2 provides the flexibility for the location of appropriate	No	N/A

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				<p>within the Coastal Change Management Area (CCMA), along the lines of: 2f. Proposals being for the phased roll-back of tourist accommodation within the CCMA, provided they are from the more vulnerable parts of the area (2025 Coastal Erosion Zone) to the less vulnerable parts of the area (2055 and 2105 Coastal Erosion Zones) and will not result in an increased risk to life and will be for a temporary period only (not exceeding 15 years)”</p> <p>Also, that confirmation is included to confirm that “...substantial economic, social and environmental benefits to the community...”; is not applicable to existing businesses, particularly those providing tourist accommodation.</p>	<p>new development within the CCMA. The policy should be read together with Policy CC6: Coastal Change Adaptation. A joint Coastal Adaptation SPD, which is due to be adopted in the summer of 2023, will provide more detailed planning guidance regarding different types of development that would be accepted within the CCMA, along with rollback and enabling development. The SPD is programmed to be adopted in 2023.</p> <p>Conclusion No change proposed.</p>		
PC104	North Norfolk District Council	3.5 Coastal Change Management	Policy CC5, Footnote 1	Add ‘Planning’ before (General Permitted Development) Order	<p>Comment noted, modification is proposed to Policy CC5, footnote 1. To correct factual error.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/CC5/01
LPS320	Mr David Spray (Marine Management Organisation)	3.5 Coastal Change Management / Spatial portrait	3.5.2	High levels of referral to Shoreline Management Plans, referral to Marine Plans for Local Plan policies with overlap and relevance to marine planning would demonstrate regard for marine plans as required under the Marine and Coastal Access Act 2009 58(3).	<p>Comment noted, modification is proposed to Para. 3.5.2 to provide information regarding the interrelationship between terrestrial and marine planning.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/3.5/02
PC119	North Norfolk District Council	3.6 Coastal Change Adaptation	3.6.5 Policy CC6	For further clarity, add sentence to Para. 3.6.5 and Policy CC6, Criterion 2.3 to be explicit that if it can be demonstrated that a suitable site well related to the coastal community cannot be secured a site within or adjacent to a Selected Settlement is appropriate. In addition, change Criterion 2 numbering (1, 2, 3) to lettering (a,b,c) for consistency.	<p>Comments noted, modifications agreed as requested.</p> <p>Although the overall objective of Policy CC6 is to sustain local coastal communities through the rollback process, it is acknowledged that further flexibility needs to be built in to the policy to allow for circumstances where an Applicant can demonstrate that a suitable site close to the existing community cannot be secured. This is further secured in Criterion 3 of the policy.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/3.6/01 PMIN/CC6/01
LPS81	Mr John Long, John Long Planning Ltd (Blue Sky Leisure)	3.6 Coastal Change Adaptation	Policy CC6	<p>Amendments to Policy CC6 as follows:</p> <p>1a. the proposed development replaces that which is in the Coastal Change Management Area as defined on the Policies Map, and is forecast to be affected by erosion within 50 years of the date of the proposal;</p> <p>1d. taken overall (considering both the new development and that which is being replaced) the proposal should result in no net detrimental impact upon the landscape, townscape or biodiversity of the area, having regard to any special designations, unless outweighed by the social and/or economic benefits accruing from the relocation of the development.</p> <p>And a new clause:</p> <p>4. the temporary siting of touring and static caravan pitches will be permitted within different parts of the Coastal Management Area to enable pitches to be safely moved from the most vulnerable areas of the Coastal Change</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy CC6 as requested.</p> <p>The threshold of the 50 year erosion risk area is considered to be appropriate and reasonable for the consideration of rollback and relocation as it allows property owners to take a pro-active decision to relocate to an alternative location well before erosion becomes an imminent threat.</p> <p>The matter of weight in relation to substantial social and economic benefits is clearly set out in the Planning Practice Guidance, in regard to development within the CCMA. This matter is addressed within Criterion 3c. of Policy CC5: Coastal Change Management. The two policies must be read together, particularly where phased rollback both within and outside the CCMA is being proposed. The draft Coastal Adaptation SPD, which is due to be adopted in the first half of 2023, will provide more detailed guidance regarding the acceptability of different types of development within the CCMA, rollback and relocation and enabling development.</p> <p>Conclusion No change proposed.</p>	No	N/A

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				Management Area (i.e. the 2025 Coastal Erosion Zone), to the lesser vulnerable areas in the Coastal Change Management Area (the 2055 and 2105 Coastal Erosion Zone); in a managed and phased way and for a temporary period only (no more than 15 years), before being eventually relocated completely outside of the Coastal Change Management Area.			
LPS44	Dr Victoria Holliday	3.7 Flood Risk & Surface Water Drainage	Policy CC7	Point 1 need to say a SuDS is required in all cases. Point 5 – flood risk assessment must be done by national body such as EA. Point 2 e ' Developers must have evidence of ..Anglian Water assurance that adequate foul water treatment is provided ...':	Comments noted. SuDS remains the preferred approach by Anglian Water and the Lead local Flood Authority however discharge into such schemes is not always possible especially for small schemes. These matters were fully explained in the section text The Council does not consider it appropriate to amend the policy as requested. As detailed in the Infrastructure Development Plan section 5.6 In order to assess the need for new infrastructure the Anglian Water uses forecasted population growth as well as considering planned growth by Councils through their emerging Local Plans and cross referenced to submitted planning applications – where they are a statutory consultee. Conclusion No Change proposed	No	N/A
LPS126/ LPS203	Mrs Gemma Harrison (Holt Town Council) Mrs Gemma Harrison. (Cley parish council)	3.7 Flood Risk & Surface Water Drainage	Policy CC7	Cllrs believe no development should take place in known flood zones and would like to see this policy more robust to discourage building in flood zones. Amend policy to restrict building in flood zones. Wording to be looked at and altered to state that building in flood zones is discouraged	Comments noted. National policy sets out an approach using the sequential approach in order to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. Adjusting the approach (2a) as stated would mean the local Plan approach would be at odds to national policy. Conclusion No Change proposed	No	N/A
LPS598	Mr Jimmy Miller (Tunstead Parish council)	3.7 Flood Risk & Surface Water Drainage	Policy CC7	The PC feel that it is important to model any influences that a change in another area may have on other parishes, such as Tunstead	Comments noted. The Local Plan is informed by the strategic Flood Risk Assessment, SFRA which details flood Risk from all sources. No specific modification have been suggested Conclusion No Change proposed	No	N/A
LPS723	Mrs Debbie Mack (Historic England)	3.7 Flood Risk & Surface Water Drainage	Policy CC7	Make reference to consideration of archaeology	The Council does not consider it necessary to amend the policy as requested. The comment does not relate specifically to the strategic policy proposed and covers matters that are addressed though other specific policies across this Plan such as ENV7 Protecting and Enhancing the Historic Environment. Conclusion No Change proposed	No	N/A
PC011	North Norfolk District Council	3.8 Electric Vehicle Charging	3.8.1	December 2021, the Government announced [3] that new homes and buildings such as supermarkets and workplaces, as well as those undergoing major renovation, will be required to install electric vehicle charge points from 2022. [3] PM to announce electric vehicle revolution - GOV.UK (www.gov.uk)	Comments noted, modification is proposed to Para. 3.8.1 to update the national changes in ECV chargepoint provision for new dwellings and commercial premises. Conclusion Agree to requested modification update in line with legislative change.	Yes	PMIN/3.8/02

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PC108	North Norfolk District Council	3.8 Electric Vehicle Charging	3.8.2	Para. 3.8.2 refers to NPPF and then next sentence refers to 'The Framework'. Replace latter with NPPF.	Comment noted, modification is proposed to Para. 3.8.2 as proposed. Conclusion Agree to requested modification.	Yes	PMIN/3.8/03
PC022	North Norfolk District Council	3.8 Electric Vehicle Charging	3.8.3	The second sentence refers to 'draft policy'. Remove the word 'draft.'	Comments noted, modification is proposed to Para. 3.8.3 to remove reference to 'draft' policy. Conclusion Agree to requested modification.	Yes	PMIN/3.8/04
LPS384	Mr Garth Hanlon, Savills (Holkham Estate)	3.8 Electric Vehicle Charging	3.8.7 3.8.8	Policy welcomed but supporting paragraphs 3.8.7 and 3.8.8 are not justified in terms of their wording. Para. 3.8.8: Do not consider that reference to a draft policy is appropriate within a Regulation 19 version of a Local Plan. Similarly, it states that the relevant Policy will be one with the greatest level of Electric Vehicle charging provision, which cannot be justified at this stage.	Comments noted, modification is proposed to Para. 3.8.7 to remove reference to 'draft' policy. (Para. 3.8.8 quoted in error). Conclusion Agree to requested modification. Para. 3.8.7: any future ECV levels within the Norfolk County Council Parking standards will be a material planning consideration, as stated. As such, and given the rapid nature of this policy area, reference to the potential for a higher level of provision is considered justified.	Yes	PMIN/3.8/01
LPS76	Mr John Long, John Long Planning Ltd (Blakeney Hotel)	3.8 Electric Vehicle Charging	Policy CC8	That Policy CC 8 Section 4 is amended as follows: 4. Proposals for hotels (use class C1) will include active (1) provision for electric vehicle charging points of a minimum of 30% of all new parking spaces, subject to technical feasibility and financial viability.	Comment noted. The Council does not consider it necessary to amend Policy CC8 as proposed. The Policy provides a positively worded strategic approach for all development types. The matters of technical feasibility and viability would apply to all development types, not just hotels. It is considered that the Policy wording takes account of different eventualities with regard to 1.... 'development type and size, the level of parking provision and its context and location..', and the Policy is also considered to be in alignment with the Building Regulations Approved Document S :Infrastructure for the charging of electric vehicle. The viability of electric vehicle charging has been assessed as part of Policy HC4 Infrastructure Provision, Developer Contributions & Viability. Every planning proposal would be made taking account of the development plan as a whole. Conclusion No change proposed.	No	N/A
LPS384	Mr Garth Hanlon, Savills (Holkham Estate)	3.8 Electric Vehicle Charging	Policy CC8	We are further concerned at a policy that makes no reference to the issues of power supply and the access to that power supply. Given the above suggest that new text be inserted within paragraph 1 of Policy CC8 to read "proposals for Vehicle Parking is incorporated, will include appropriate provision for Electric Vehicle Charging-points, taking account of the development type and size, the level of parking provision, its context, location, availability and accessibility to necessary power supply....."	Comment noted. The Council does not consider it necessary to amend Policy CC 8 as requested. It is considered that the Policy wording takes account of different eventualities with regard to 1.... 'development type and size, the level of parking provision and its context and location..', particularly when coupled with the Building Regulations Approved Document S :Infrastructure for the charging of electric vehicles. The viability of electric vehicle charging has been assessed as part of Policy HC4 Infrastructure Provision, Developer Contributions & Viability. Every planning proposal would be made taking account of the development plan as a whole. Conclusion No change proposed.	No	N/A
LPS400	Sarah Hornbrook, Bidwells LLP	3.8 Electric Vehicle Charging	Policy CC8	To ensure compliance with this aspect of the Framework, Policy CC8 should be amended to ensure that development is	Comments noted. The Council does not consider it necessary to amend Policy CC 8 as proposed.	No	N/A

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LPS431 LPS458	(ESCO Developments, Flagship Housing Group & Lovells Partnerships) Mr Jake Lambert, Bidwells (Hopkins Homes) Mr Jake Lambert, Bidwells (Broadland Housing Association)			not constrained by potentially undeliverable off-plot electric car charging provision, and to align with mandatory standards introduced by an update to Part S of the Building Regulations from June 2022. Suggested revisions to the wording are set out below. 2.Where off-plot or communal parking is provided, active and passive chargepoints will be provided wherever practical and feasible a minimum of 50% of spaces will provide active(1) chargepoints and the remainder will be passive(2). The spaces should be made available to all residents in accordance with a management agreement.	It is considered that the Policy wording takes account of different eventualities with regard to 1.... 'development type and size, the level of parking provision and its context and location..', and the Policy is also considered to be in alignment with the Building Regulations Approved Document S :Infrastructure for the charging of electric vehicles. The viability of electric vehicle charging has been included in Policy HC4 Infrastructure Provision, Developer Contributions & Viability. The Policy provides more certainty to different planning development/uses with the main objective that new chargepoints be designed in to a proposed scheme at the planning stage to avoid practicality issues. Also, adding a feasibility test to the policy wording would not deliver the policy objective, which is now a legal requirement for new development. Every planning proposal would be made taking account of the development plan as a whole. Conclusion No change proposed.		
LPS488	Mr Mark Singer, Barton Willmore (Sutherland Homes)	3.8 Electric Vehicle Charging	Policy CC8	To ensure the policy is justified, evidence should be provided to support the deliverability of the policy, with the necessary infrastructure set out in the Infrastructure Delivery Plan, informed by North Norfolk Power Study Report. To ensure the policy is effective, we also suggest the following change (which reflects the London Plan Policy T6.1) "Proposals for residential development (excluding use class C1 hotels and C2/C2A residential institutions) where private driveways and garages are provided, at least 20 per cent of spaces should have active charging facilities, with passive provision for all remaining spaces. 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 will provide active chargepoints and the remainder will be passive. The spaces should be made available to all residents in accordance with a management agreement."	Comments noted. The Council does not consider it necessary or justified to amend Policy CC 8 as proposed. The Policy requirement for ECV chargepoints at point 1) is in accordance with the Government's published Taking Charge: The Electric Vehicle Infrastructure Strategy, which states that from June 2022, Government are requiring all new homes with associated parking, including those undergoing major renovation, to have chargepoints installed at the point of construction. The policy wording will deliver this important policy objective, which is now a legal requirement for new development. Conclusion No change proposed.	No	N/A
LPS768	Mr Mark Behrendt (Home Builders Federation)	3.8 Electric Vehicle Charging	Policy CC8	Deletion of Policy CC8. The HBF recognise the need to increase access to electric vehicle charging points as the ownership of such cars grows. However, the HBF consider the most effective approach in relation to residential development is that set out by the Government through an updated part S of the Building Regulations from June 2022. This approach provides the necessary consistency across the country as to what is required both in terms of the number of charging points but also the technical standard as to the type of charger to be used.	Comments noted. The Council does not consider it necessary or justified to delete Policy CC 8 as proposed. The policy is provided in accordance with national planning policy and guidance and in particular, NPPF para. 112.e) and 107.e). The level of ECV charging is not described in detail for all types of development within the Building Regulation Part S Document, nor in the County Council's Parking Guidelines for new developments in Norfolk (July 2022). The Policy provides more certainty to different planning development/uses with the main objective that new chargepoints be designed in to a proposed scheme at planning stage to avoid practicality issues. The policy wording will deliver this important policy objective, which is now a legal requirement for new development.	No	N/A

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					Conclusion No change proposed.		
LPS780	Mr Ziyad Thomas, Planning Issues Ltd (Churchill Retirement Living & McCarthy Stone)	3.8 Electric Vehicle Charging	Policy CC8	That a proportionate and appropriate cost is attributed for the provision of electric vehicle charging points in the North Norfolk District Council Interim Plan Wide Viability Assessment We respectfully refer the Council to the evidence supporting the Government's response to the consultation on EVCPs estimated an installation cost of between £615 to £1,115 per EVCP for off-street parking and between £975 and £2,947 per charge point for multi-occupancy surface parking.	Comments noted. The Council does not consider it necessary to amend Policy CC 8. The modification does not directly relate to the Policy, but concerns the costing/ viability of ECV chargepoints and infrastructure. The local plan is supported by an up to date and proportional viability study, which include cost allowances for ECV chargepoints. Conclusion No change proposed.	No	N/A
LPS625 LPS626	Mr Lyndon Swift (Weybourne Parish Council)	3.9 Sustainable Transport	3.9.5 3.9.6	Levels of traffic are beyond the capacity of the road network and any further development will exacerbate existing problems. In order to meet the "Effective" test of soundness the Plan needs to recognise the need for improvements to infrastructure. It also needs to ensure that development meets the genuine needs of the district, rather than the arbitrary 9,600 more houses, the construction of which will suck in additional traffic, especially if they are used as second homes/holiday lets. In order for this Plan to be effective, there is a need for specific requirements of developers to enhance public transport as well as links to this on foot or by bicycle, and for the District and County Councils to address the inadequacy of local transport.	Comments noted. No specific modification has been requested. The Council does not consider it necessary or to amend the supporting text as requested. The plan promotes development in line with the NPPF. Planning obligations can only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and proportion to the development; NPPF para. 57. The plan focusses the majority of the proposed development in the districts most sustainable locations, which are well served by higher order roads and public transport. Conclusion No change proposed.	No	N/A
LP668	Mrs Laura Joyce (Natural England)	3.9 Sustainable Transport	Policy CC9	Comment: Large infrastructure schemes present opportunities to secure net gains for biodiversity and wider environmental gains and we advise that this is included within the supportive text of the policy.	Comment noted. The Council does not consider it necessary to amend the supportive text of Policy CC9. The requirements for Biodiversity Net Gain is covered in detail in section 3.10 and Policy CC10 of the plan. As such, proposals for large infrastructure schemes would trigger Policy CC10. No specific modification requested. Conclusion No change proposed.	No	N/A
LPS204	Mrs Gemma Harrison (Cley Parish Council)	3.9 Sustainable Transport	Policy CC9, Criterion 4	Point 4 is a difficult policy to implement and Cllrs felt this is not effective and could be re-worded better. Any increase of traffic will have a negative impact and therefore how severe that impact is will depend on who is assessing it and who is impacted.	Comment noted. No specific modification requested. The Council does not consider it necessary to amend Policy CC9. The terminology used in criterion 4 allows for consideration of the matters to be assessed on a case by case basis, in consultation with the Highway Authority and is in conformity with the NPPF (para 111) Conclusion No change proposed.	No	N/A
LPS45	Dr Victoria Holliday	3.9 Sustainable Transport	Policy CC9, Criterion 4 & 5	Definitions for 'unacceptable impact' and 'significant amounts' should be given, and a lower threshold set for when a travel plan is required as part of a development proposal.	Comments noted. The Council does not consider it necessary to amend Policy CC9 as proposed. The terminology and relevant thresholds are informed by national policy and guidance and cannot be specifically defined, being a matter of assessment on a case by case basis, in consultation with the Highway Authority.	No	N/A

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					<p>Conclusion No change proposed.</p>		
LPS797	Mr Darl Sweetland, (Anglian Water)	4.1 Spatial Strategy	4.1.1 Policy SS1	CLARIFICATION: We note that in 4.1.1 the Settlement Hierarchy has taken account of the 'infrastructure in each place' and 'the extent to which future developments may be constrained...'. Apart from one reference in the SA Page 146, it is not evidenced how much weight has been attached to the objective of using embedded carbon/existing (water/wastewater) infrastructure in determining the spatial location, quantum and phasing of growth.	<p>Comments noted. The Distribution of Growth Paper includes details regarding infrastructure constraints for each identified settlement within Policy SS1, which includes information regarding water and foul sewerage capacity and requirements, as well as, and environmental constraints such as flood risk. These issues along with services and facilities, built environment, natural environment, housing need and supply of suitable sites has informed the identification of the identified towns and villages. No specific modification requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS104 LPS47	Dr Victoria Holliday	4.1 Spatial Strategy	4.1.7 Policy SS1, Criterion 3	<p>Small growth villages in Coastal Wards should either be removed, the new home allocation reduced to say 3% and within the settlement boundary. The designation of those small growth villages with marginal amenities should be reviewed and, if appropriate, changed.</p> <p>Principal residency restrictions should be imposed.</p> <p>For Large Growth Villages in Coastal Ward, principal residency should be imposed on new dwellings.</p> <p>For Small Growth Towns, additional infrastructure must be in place before development starts in order not to disadvantage those in surrounding villages.</p>	<p>Disagree. The Council does not consider it necessary to amend Para. 4.1.7 or Policy SS1 as requested.</p> <p>The updated Distribution of Growth Background Paper sets out the rationale and methodology for the settlement hierarchy within Policy SS1, including the identification of the Small Growth Villages, where the limited capacity of these settlements is taken into account, in terms of their constraints; character and level of facilities, alongside the local housing need. The coastal location of settlements is not a determining factor. The selected Small Growth Villages are served with similar services as elsewhere in the district.</p> <p>The issue of second homes and principal residency has recently been investigated by the Council. This included possible impacts on the housing market and what land use planning measures could be used to influence and mitigate perceived negative impacts. These matters were fully considered at Overview and Scrutiny Committee, July 2022 and set out in the impact of second homes report.</p> <p>Infrastructure delivery is covered in other policies of the local plan, including Policy HC4.</p> <p>No specific modifications requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS177	Ms Beccy Rejzek, Lanpro (Firs Farm Partnership)	4.1 Spatial Strategy	4.1.9	Paragraph 4.1.9 in relation to the 6% growth - for Sutton this means an indicative allowance of 30 dwellings as shown at Table 2. It is understood from this that the 'allowance' is not a specific maximum number not to be exceeded, but rather provides for development in the range of approximately 30	<p>Comments noted, part modification agreed to provide new footnotes to Policy SS1 to add further explanation to the terminology of Criterion 3f. in relation to 'adjacent developable land', 'agreed terms' and 'local Registered Social Landlords.'</p> <p>The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to</p>	Yes (part)	PMIN/SS1/02

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LPS178	Ms Beccy Rejzek, Lanpro (Firs Farm Partnership)		Policy SS1	<p>dwellings or 6% growth. It would be helpful if paragraph 4.1.9 could provide clarity on this.</p> <p>Policy SS1, Criterion 3e: is too specific and restrictive. There are other community benefits that have not been included.</p> <p>3e. The proposal incorporates substantial community benefits, such as but not limited to, infrastructure and service improvements or improved connectivity to the village and wider GI network; and,</p> <p>3f. is unnecessarily onerous requirements that will be difficult to comply with and represents a barrier to the delivery of new homes. Main concerns:</p> <ul style="list-style-type: none"> • It is unclear what the offer of the site 'together with any adjacent land' means? Is it meant to refer to land within the same ownership? If not, how is a site owner meant to agree making such an offer with adjacent land owners? • What does an offer 'on agreed terms' mean? Who is the agreement intended to be between? • How are local registered Social Landlords proposed to be identified? How many does this involve? • What evidence is expected to be provided to demonstrate compliance? <p>3f. "in the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to local Registered Social Landlords on agreed terms which would allow its development for affordable homes, and such an offer has been declined."</p>	<p>promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79)</p> <p>The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the rationale and methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth.</p> <p>Conclusion Agree to modification (part)</p>		
LPS798	Mr Darl Sweetland (Anglian Water)	4.1 Spatial Strategy	4.1.9 Policy SS1	<p>CLARIFICATION: With reference to 4.1.9, it is not evident whether the Small Growth Village apportionment takes account of water supply, wastewater, or water quality capacity/ environmental constraints. For example, the apportionment in Table 2, page 63 and specially Footnote 3, it is not clear whether the village apportionment figure takes into account the headroom capacity or the need for further investment/ carbon intense capacity increases in the wastewater pipeline or treatment capacity network.</p>	<p>Comments noted. See related proposed modifications PMIN/4.1/03 and PMIN/4.1/04 that clarifies this matter in relation to Horning.</p> <p>Background Paper 2 Distribution of Growth includes details regarding infrastructure constraints for each identified settlement within Policy SS1, which includes information regarding water and foul sewerage capacity and requirements, as well as, and environmental constraints such as flood risk. These issues along with services and facilities, built environment, natural environment, housing need and supply of suitable sites has informed the identification of the identified towns and villages.</p> <p>No specific modification requested.</p> <p>Site selection has been informed by a range of environmental information. The Council have carefully considered the distribution of proposed growth having regard to a range of considerations, including utilities, the need for development, particularly affordable homes and capacity of places to support growth having regard to key infrastructure, services and environmental constraints.</p> <p>Conclusion No change proposed.</p>	No	N/A

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LPS516	Mr Roy Allen	4.1 Spatial Strategy	Figure 6 & Figures 3,5,7,8,9,10 and 11	Langham Village is not included in the lists of Small Growth Villages (pp63 & 64). This is correct as we have no shop or post office and do not fulfil the criteria requirements. However on the map (p66) and on all other similar maps in the Development Plan, Langham is shown as a Small Growth Village with a small grey dot. These maps are, therefore, incorrect. I trust you are able to address this matter and would appreciate an acknowledgement of this letter, and confirmation that Langham is classed as a Countryside Village. Consequential changes for the same reason to Figures 3,5,7,8,9,10 and 11.	Comment noted. The locational reference to Langham on the various maps within the plan has already been identified as a minor modification and these references will be removed from the maps accordingly. Conclusion Agree to requested modification.	Yes	PMIN/4.1/02
PC073	North Norfolk District Council						
LPS308 LPS297 LPS303	Mr Sam Hazell, Lawson Planning Partnership Ltd (White Lodge Norwich Ltd)	4.1 Spatial Strategy	Policy SS1	Object to current approach and request to revert to the previous approach proposed in the First Draft Plan Part 1 (Reg 18) to allocate housing sites in Small Growth Villages (SGVs), and High Kelling in particular to meet local needs, and changes to detailed policy wording so as not to unintentionally hinder suitable sites from being delivered in rural locations, and also enable the delivery of affordable housing in these areas. The proposed strategy is unjustified as it does not explain the blanket 6% growth and it does not take into consideration the differing sizes, housing need, employment opportunities and characteristics etc. of the district's villages. There is a lack of evidence for the identified SGVs. Changes required to Policy SS1: Criterion 3a. The site immediately abuts is adjacent to the defined Settlement Boundary. If not accepted, a further request is that the settlement boundary of High Kelling is amended to include part of Cromer Road (see alternative boundary plan). , to enable the Four Seasons Nursery site to come forward for housing development to meet High Kelling's local housing need. Previous discussions with the Council indicated a need for 8 new affordable homes in the village, and the Former Four Seasons Nursery site is the only deliverable site outside the AONB. The site would make a meaningful contribution to affordable housing in the village, as well as providing market homes to meet local needs. Criterion 3b. The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more that 6% as outlined in Table 2 'Small Growth Villages Housing Apportionment' proposed meets a proven local need for housing.	Disagree. The Council does not consider it necessary to amend Policy SS1, Criterion 3 as requested. The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79) The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. The amount of growth allocated for Small Growth Villages also takes account of the limited capacity of these settlements in terms of their constraints; character and level of facilities, alongside the local housing need. Conclusion No change proposed.	No	N/A

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				<p>Criterion 3f. In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land has first offered to local Registered Social Landlords on agreed terms which would allow its development for affordable homes, and as such an offer has been declined.</p> <p>The site would not comply with Policy SS1 as currently written. Request to apply the settlement boundary review methodology and criteria consistently to all of the District's settlements, and include existing development to the south of Cromer Road/ Cromer Road (including the Site) in the defined settlement boundary. If this change is not accepted, we request that the settlement boundary for High Kelling is amended to encompass the A148 Cromer Road.</p> <p>To reflect the functional and visually identifiable nature of development to the south of the A148 Cromer Road, which forms an integral part of the village and should therefore be included in the settlement boundary, the settlement boundary for High Kelling should be amended to include land at the Former Four Seasons Nursery, as shown on the LPP Proposed Settlement Boundary Plan, attached.</p>			
LPS452	Kayir Mahil, WSP Ltd (Colegate Management)	4.1 Spatial Strategy	Policy SS1	<p>The Plan contains policies that are discouraging of growth outside of settlement boundaries, seemingly ignoring that only sites outside of settlement boundaries will be able to come forward in SGVs. Notwithstanding our commentary on the questionable robustness of the approach to SGVs, if this were to be fulfilled, then more positive policy wording should be in place in the Plan to ensure that growth can come forward. We suggest the following additions/edits to Policy SS 1:</p> <p>Criterion 3: Outside of the defined boundaries of Small Growth Villages residential development that meets the identified need in the Local Plan will be permitted in areas that are well-located in relation to the settlement and uphold its character only where all of The following criteria are satisfied should be considered:</p> <p>a. The site should immediately abuts the defined Settlement Boundary;</p> <p>b. The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually more than 6% as outlined in Table 2 'Small Growth Villages Housing Apportionment', (1)disproportionately; and,</p> <p>c. The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character; and,</p> <p>d. Safe and convenient access can be provided; and,</p>	<p>Comments noted, part modification agreed to Policy SS1, Criterion 3e. as the Council recognises that community benefits, including infrastructure etc. should be required in terms of what is necessary.</p> <p>The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79)</p> <p>The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. The amount of growth allocated for Small Growth Villages also takes account of the limited capacity of these settlements in terms of their constraints; character and level of facilities, alongside the local housing need.</p> <p>Conclusion Agree to modification (part).</p>	Yes	PMIN/ SS1/01

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				<p>e. The proposal incorporates substantial community benefits, including necessary infrastructure and service improvements and improved connectivity to the village and wider GI network; and,</p> <p>f. In the case of sites in excess of 0.25 hectares, the site, consultation with together with any adjacent developable land, has first been offered to local Registered Social Landlords should be undertaken to deliver affordable housing in line with the policies of this Plan. on agreed terms which would allow its development for affordable homes, and such an offer has been declined</p> <p>Settlement Boundary Review (SGVs) January 2022:</p> <p>This approach to settlement boundaries is clearly not positive in encouraging future housing. It increases reliance on windfall development, on unallocated land, within the countryside, to provide the 6% growth in many cases. This would certainly be the case in the example of Sculthorpe. The settlement boundary for Sculthorpe in the adopted Local Plan is proposed to be amended slightly. However, none of the boundary amendments provide an opportunity for future development and certainly there is no space for the 20 dwellings planned to come forward within the settlement boundaries. This clearly does not represent a positive and forward-looking approach to the settlement, when suitable available land has been promoted through the Local Plan process.</p>			
LPS54	Mr Edward Witton	4.1 Spatial Strategy	Policy SS1 All paragraphs	<p>Villages have been classed as “unsustainable” because they no longer have a post office or access to public transport. These villages have been left in a permanent cycle of decline for years because planning authority sustainability assessments measure villages against a range of services and amenities more akin to how previous generations lived and used services, rather than focussing on modern day needs. The consequence is that these villages and hamlets will continue to decline rather than be allowed to thrive and grow, contrary to NPPF 5.78.</p> <p>The strategy of identifying proposed Growth Villages should be revisited with the District Council considering a plan to support all villages with a population above say 500 being viewed with a forward looking perspective. Without this, the villages will either wither and die, or alternatively perhaps become elitist strongholds of the very aged.</p>	<p>Comments noted. The Council does not consider it necessary to amend the settlement hierarchy as requested.</p> <p>The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79) The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The settlements have been identified for growth on the basis of a broad range of services and facilities, which are considered to be key to sustainability. The proposed use of number of residents is considered to be a poor indicator in relation to sustainability. No specific modifications requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS151	Mr Michael Rayner (CPRE Norfolk)	4.1 Spatial Strategy	Policy SS1	Point 3 of Policy SS 1 should be removed, so that no growth would be allowed outside the boundaries of small growth villages under this policy.	<p>Disagree. The Council does not consider it necessary to remove/ amend Policy SS1 as requested.</p> <p>The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to</p>	No	N/A

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				If the Policy remains, point 3b needs to be reconsidered to give greater certainty to no more than the proposed number of new dwellings being permitted under this policy.	<p>promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79)</p> <p>The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. Table 2 clearly provides the Housing Apportionment for each Small Growth Village, which is considered to provide a reasonable level of certainty to the potential growth of the settlements.</p> <p>Conclusion No change proposed.</p>		
LPS158	Mr John Long, John Long Planning Ltd (Flagship Homes)	4.1 Spatial Strategy	Policy SS1	<p>Existing allocations in the current Local Plan (Site Allocations DPD) in villages including Bacton should be rolled over and included in the emerging Local Plan, where landowners/promoters are able to confirm intentions to deliver housing as is the case with BACT03;</p> <p>Policy SS 1 (or its reasoned justification/supporting text) should provide an indication of the scale of growth that would meet the definition of 'small scale' in the context of Small Growth Villages;</p> <p>The Settlement Boundary for Bacton should be redrawn to include all of the village's developed/built up area, including adjacent tourism accommodation sites.</p>	<p>Disagree. The Council does not consider it necessary to amend Policy SS1 and supporting documents as requested.</p> <p>The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79)</p> <p>The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. It is considered that 6% adequately defines what small scale is within the Policy. Bacton is identified as a Small Growth Village, where there is inadequate evidence for delivery of site BACT03, but this site could still come forward through the Small Growth Village element of the policy.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS322	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)	4.1 Spatial Strategy	Policy SS1	<p>Policy SS1 Spatial Strategy – Recommended Amendments</p> <ol style="list-style-type: none"> 1. The majority of new development will be located in the larger towns and villages in the District having regard to their role as employment, retail and service centres, the identified need for new development and their individual capacity to accommodate sustainable growth. Where sustainable alternatives are available, Major development will not be permitted in the North Norfolk Coast Area of Outstanding Natural Beauty other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Development will be located where it minimises the risk from flooding and coastal erosion and mitigates and adapts to the impacts of climate change. 2. No comment 3. Outside of the defined boundaries of Small Growth Villages residential development will be permitted 	<p>Disagree. The Council does not consider it necessary to amend Policy SS1 as requested.</p> <p>The Council contends that it will not always be possible to restrict development outside the AONB, for example Wells, Blakeney, and to a large extent, Holt.</p> <p>In response to amendments to Policy SS1, Criterion 3, it is considered that the 6% growth allowance is a key distributional aspect of the policy and should be retained. The proposed removal of text within criterion 3c. would undermine the small scale incremental growth that is proposed for the identified Small Growth Villages and criterion 3f. is considered important to include local Registered Social Landlords to ensure that the plan gives priority to affordable housing.</p> <p>See minor modification PMIN/SS1/01 in relation to the part of the requested modification to criterion 3e.</p> <p>Conclusion No change proposed.</p>	No	N/A

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				<p>only where all of the following criteria are satisfied:</p> <p>a. The site immediately abuts the defined Settlement Boundary;</p> <p>b. The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually across all of the Small Growth Villages equates to around more than 6%,XXX* dwellings; as outlined in Table 2 'Small Growth Villages Housing Apportionment'.</p> <p>c. The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historical character; and</p> <p>d. Safe and convenient access can be provided; and</p> <p>e. The proposal incorporates substantial community benefits which may include (as examples), including necessary infrastructure and service improvements, and improved connectivity to the village and wider GI network, or an uplift in affordable housing above the requirement set out in Policy HOU2 where it meets a demonstrable need; and</p> <p>f. In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to a Registered Social Landlord on agreed terms which would allow its development for affordable homes, and such an offer has been declined.</p> <p>*Figure to be determined as a proportion of the overall residual growth required by the plan</p>			
LPS216 LPS228 LPS229 LPS232	Ms Gabrielle Rowan, Pegasus (C&S Norfolk Ltd)	4.1 Spatial Strategy	Policy SS1	<p>Comments on Policy SS1 where it relates to Small Growth Villages Criterion 3 is as follows:</p> <p>Criteria 3B to allow for flexibility if ONS data shows a change in population size. Clarification is needed if 6% will change over time as new census data becomes available. Will the figures in Table 2 be revised?</p> <p>Criteria 3E to include wording as follows: The proposal, where proportionate, incorporates substantial community benefits, including necessary infrastructure and service improvements and improved connectivity to the village and wider GI network;</p> <p>Criteria 3F to provide detail of required process,</p>	<p>Comments noted, part modification to Policy SS1, Criterion 3(e) amendment agreed under PMIN/SS1/01 and Criterion 3(f) agreed under PMIN/SS1/02.</p> <p>The 6% growth in Small Growth Villages is benchmarked against a set of data at a point in time, which provides an indicative allowance.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS205	Mrs Gemma Harrison (Cley Parish Council)	4.1 Spatial Strategy	Policy SS1	<p>Amend policy to reduce growth for small growth villages and look at adding a policy to protect housing stock for locals / prioritise local people for new housing stock.</p>	<p>Disagree. The Council does not consider it necessary to amend the percentage of growth apportioned to Small Growth Villages as requested.</p> <p>The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79). The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth</p>	No	N/A

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					<p>Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth.</p> <p>Small Growth Village housing growth will address all housing need and gives priority to affordable housing. Occupation is a matter for the Housing Strategy which sits outside planning policy.</p> <p>Conclusion No change proposed.</p>		
LPS242	Julia Edwards, Brown & Co and Corylus Planning & Environmental Ltd	4.1 Spatial Strategy	Policy SS1	Policy SS1 Criterion 1, second sentence is not clear nor entirely consistent with that in Policy ENV1. We consider that the wording in ENV1 is clearer and a better reflection of national AONB policy. To make the plan sound we therefore suggest the wording in SS1 is revised to accord with ENV1.	<p>Agree modification as proposed. Amend wording in Policy SS1, Criterion 1 to align with the wording in Policy ENV1 in relation to major development proposals not being permitted within the AONB unless there are exceptional circumstances that exist and it can be demonstrated that the proposal is in the public interest.</p> <p>Conclusion Agree to modification.</p>	Yes	PMIN/SS1/03
LPS330	Patrick Allen	4.1 Spatial Strategy	Policy SS1	<p>Langham should be reinstated within the text, as it appears on all the maps in the plan.</p> <p>Despite the lack of a village shop, Langham still justifies inclusion as a Small Growth Village using the Authorities very own methodology, having a primary school, village pub, hotel, museum, church, village hall and playing field.</p>	<p>Disagree. The Council does not consider it necessary to amend the list of Small Growth Villages to include Langham, as requested. The Council has reviewed the settlements and Langham does not meet the criteria set out in the methodology contained in the updated Distribution of Growth Background Paper. A separate modification is proposed in order to remove Langham from applicable map figures within the Plan.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS327	Mr Ollie Eyre, Deloitte (Church Commissioners for England)	4.1 Spatial Strategy	Policy SS1	The allocation of Ludham as a Large Growth Village is not opposed in principle. The representation relates to the promotion of an alternative site 'Land south of Norwich Road' in Ludham, 8 smaller sites and 'Land East of Abbot Road' (an allocated site in the Core Strategy) in Horning. There are concerns that the Council has failed to justify the re-allocation of the sites in Ludham. Horning is identified as a SGV, where no sites have been allocated, including 'Land East of Abbot Road', which is the subject of a live application (PO/11/1505). It is requested that the site at Abbot Road be allocated in the plan to provide more certainty that the housing target will be met.	<p>Comments noted. The Council does not consider it necessary to amend Policy SS1 as requested. Sufficient and preferable sites have been identified to meet the scale and growth in the village of Ludham, a Large Growth Village. The local plan does not intend to allocate sites in identified Small Growth Villages, but the Horning site 'Land East of Abbot Road' would be considered under this approach. Priority would be given to the first schemes with this process.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS315	Matthew Thomas, CODE Development Planners	4.1 Spatial Strategy	Policy SS1	Proposes that the settlement of Hempton, has not been properly assessed, with insufficient evidence that does not justify designation as Countryside. The representation states that the settlement has a close spatial and functional relationship with Fakenham, which when coupled with the facilities and services in Hempton itself, would make it qualify as a SGV. In addition, a number of reasonable alternative sites, including brownfield land, 'within the existing built area' have not been taken into account.	<p>Disagree. The Council has reviewed all of the settlements within the Distribution of Growth Background Paper, including Hempton. It is considered that the majority of the settlement is located on the west side of the main road (A1065), which is isolated in relation to Fakenham and unattractive for alternative modes of transport such as cycling and walking into the town centre, which would make the location of any development unsustainable, where residents would be likely to rely on the private car.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS 369	Ms Erica Whettingsteel, EJW Planning (Glavenhill Startegic Land)	4.1 Spatial Strategy	Policy SS1	With regard to settlements not listed in the hierarchy the approach set out Bullet point 4 of SS1, is inconsistent with national policy. The NPPF does not promote a restrictive approach to development outside of settlements, it does not protect the countryside for its own sake, or prescribe the	<p>Disagree. The Council does not consider it necessary to amend Policy SS1 as requested. The local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to</p>	No	N/A

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				<p>type of development that is acceptable. The NPPG reiterates the objective set out in the Framework and clearly states that all settlements can play a role in delivering sustainable development in rural areas and that blanket policies restricting housing in some settlements and preventing other settlements from expanding should be avoided. The Framework's overall message in terms of supporting rural communities is clear 'a thriving rural community depends, in part, on retaining local services and community facilities. Therefore modest housing growth in villages, particularly those with existing services and facilities is consistent with the framework.</p>	<p>promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79) The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. The amount of growth allocated for Small Growth Villages also takes account of the limited capacity of these settlements in terms of their constraints; character and level of facilities, alongside the local housing need. No specific modification is proposed.</p> <p>Conclusion No change proposed.</p>		
LPS378	Mr Ian Hill, Bidwells (The Pigs Edgefield)	4.1 Spatial Strategy	Policy SS1	<p>Edgefield should be identified as Small Growth Village that has the capacity to absorb further growth, ensuring the vitality of the village is preserved. No evidence has been provided to our knowledge that demonstrates why other settlements have been selected above Edgefield.</p> <p>The methodology within the Distribution of Growth Background Paper is flawed, being too restrictive in terms of identification of key services and failing to recognise the close proximity of Edgefield to higher order settlements. We suggest that a broader range of settlements is identified, including settlements which are within close proximity of higher order settlements and have, through sustainable growth, the potential to enhance the vitality of that settlement.</p>	<p>Disagree. The Council does not consider it necessary to amend the list of Small Growth Villages to include Edgefield as requested. The Council has reviewed the settlements and Edgefield does not meet the criteria set out in the methodology contained in the updated Distribution of Growth Background Paper.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS500	Mr Ed Abigail (Environment Agency)	4.1 Spatial Strategy	Policy SS1	<p>We consider, that the Plan could be found sound, providing the addition of the below policy, or similar wording, be included separately or incorporated into the current Spatial Strategy SS 1 policy with regard to small growth villages, specifically Horning.</p> <p>Policy request: Water Quality – Foul Drainage, Horning</p> <p>Any development proposals within the Horning area and surrounding catchment for the Knackers Wood Water Recycling Centre for foul drainage and wastewater treatment, will be subject to the current Horning Knackers Wood Joint Position Statement (1) or any subsequent future revisions. To ensure the protection of designated sites and to prevent the deterioration of Water Framework Directive status, no new development that increases foul water flows requiring connection to the public foul drainage system within the Horning Knackers Wood Catchment will be permitted, until it is confirmed that capacity is available within the foul sewerage network and at the Water Recycling Centre to serve the proposed development.</p>	<p>Comments noted, modification is proposed to add explanatory footnote to Table 2- Small Growth Villages Housing Apportionment and text to Para.4.1.9. The matter of capacity at Knackers Wood Recycling Centre is recognised as an Infrastructure constraint within the Horning settlement profile of the Background Paper, 2 Distribution of Growth. Reference and link to Joint Position Statement on Development in Horning and updated Statement of Fact by Anglian Water, to be added for clarity.</p> <p>footnote Development should take account of the Joint Position Statement on Development in the Horning Water Recycling Centre Catchment and subsequent future revisions.(add hyperlink).</p> <p>Para. 4.1.9 at end of para. add: Development in Horning is subject to a Joint Position Statement and updated Statement of Fact by Anglian Water. Issues in Horning relate to Water Recycling Centre permit compliance, increased flows due to groundwater and surface water infiltration and nutrient loading. The Council is working jointly with the Broads</p>	Yes	PMIN/4.1/03 PMIN/4.1/04

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				Footnote: (1) Include link to Knackers Wood Joint Position Statement 20170124-Joint-Position-Statement-inc-LAs-Horning-v4-2017-signed.pdf (broads-authority.gov.uk)	Authority, the EA and Anglian Water to resolve this. More details can be found in the Council's Infrastructure Delivery Plan.		
LPS421	Mrs Raj Bains, Boyer Planning (Richborough Estates)	4.1 Spatial Strategy	Policy SS1	<p>Whilst we support development and growth being allocated to North Walsham, we strongly disagree that the majority of the proposed site allocations are likely to come forward in the first 5 years of the emerging plan, most importantly the proposed SUE (Policy NW62/A Land west of Walsham). There is no robust or sufficient evidence to suggest these are deliverable within the short term period of the plan. We therefore disagree that the plan is sound as the proposed housing trajectory is unjustified.</p> <p>We strongly suggest alternative sites in North Walsham are considered as allocations within the proposed plan that could deliver housing in the short term including Land at Paston Gateway. It is considered that Land at Paston Gateway is the most logical of the alternative site options to deliver housing in North Walsham. This would help contribute towards ensuring that the plan achieves the minimum housing requirement, and provides the necessary growth earlier in the plan period, which could be achieved without prejudice to the overall spatial strategy of the emerging plan.</p>	<p>Comments noted The Council does not consider it necessary to amend the policy as requested. The comment does not relate to the policy proposed and largely reiterates points raised in support of alternatives sites. A number of alternative options have been considered in the development of the Plan</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS639	Mr Lyndon Swift (Weybourne Parish Council)	4.1 Spatial Strategy	Policy SS1	<p>1. The majority of new development will be located in the larger towns and villages in the District having regard to their role as employment, retail and service centres, the identified need for new development and their individual capacity to accommodate sustainable growth. Where sustainable alternatives are available, major development will not be permitted in the North Norfolk Coast Area of Outstanding Natural Beauty. Development will be located where it minimises the risk from flooding and coastal erosion and mitigates and adapts to the impacts of climate change.</p> <p>This clause does not meet the "Justified" test of soundness. Weybourne is within the AONB.</p> <p>Villages within the AONB should be given the same protections as rural areas outside the AONB.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS1 as requested. See PMIN/SS1/03 regarding amendment to wording of Policy SS1, Criterion 1 with regard to the AONB.</p> <p>The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79). The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. The amount of growth allocated for Small Growth Villages also takes account of the limited capacity of these settlements in terms of their constraints; character and level of facilities, alongside the local housing need. The plan provides for proportionate growth across identified Small Growth Villages and designates the remaining land and settlements within the district that are not listed in the settlement hierarchy, as being with the Countryside Policy Area.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS460	Mr Jake Lambert, Bidwells (Broadland Housing Association)	4.1 Spatial Strategy	Policy SS1	Overall support for settlement hierarchy. However, there is a wish to secure greater clarity on how Part 3f of the policy will be applied in practice. For instance, BHA wish to understand whether land would be offered to Registered Social Landlords	Comments noted. See agreed modification PMIN/SS1/02 regarding the clarity of Policy SS1, Criterion 3f. Agreed terms relates to those around affordable housing provision with the Council. Land values should reflect the policy requirements.	No	N/A

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				at a market rate, or at a rate that is considered viable for a RSL to develop the site.	The Council does not consider that any further amendments are necessary. Conclusion No change proposed.		
LPS534	Mr Alistair Curran, Planning Places Ltd (PSK Building Surveyors Ltd)	4.1 Spatial Strategy	Policy SS1	Insufficient housing has been allocated in Sheringham especially considering the planned growth of Holt, an arguably less sustainable settlement (in terms of facilities and transport links) in comparison to Sheringham. Equally, in paragraph 15.0.03 of the local plan, the Council acknowledge that "There is very little previously developed (brownfield) land in Sheringham" and "New greenfield allocations are therefore necessary in order to deliver the required growth." With this in mind, the proposed strategy would actively constrict Sheringham and potentially result in an economic strangulation, especially if the tourism sector declines. Ultimately, the plan does not facilitate enough growth for the next 14+ years. A more justified strategy would be to allocate more sites for development in Sheringham for Policy SS1 to be consistent with national policy in facilitating growth and helping supply sufficient housing to meet the identified needs of the local population.	Disagree. The modification request is not specifically related to Policy SS1, as it does not appear to be objecting to the principle of Sheringham being identified as a Small Growth Town within the settlement hierarchy. As such, as a second tier settlement Sheringham along with the other Small Growth Towns are expected accommodate a lesser proportion of development (approximately 16% of new housing – see Policy HOU1), where the proportion of development will also take account of other material considerations and constraints. These are clearly set out in the Distribution of Growth Background Paper. Conclusion No change proposed.	No	N/A
LPS475	Mr Alistair Curran, Planning Places Ltd (Mr Tom Abrey & Ms Laura Caraccio-Hewitt)	4.1 Spatial Strategy	Policy SS1	Small housing allocations should be considered within smaller settlements such as Stiffkey, that are currently designated as countryside despite local shops, pubs, and regular bus services (multiple times a day throughout the week). Such allocations can offer economic benefits to the rural community whilst helping sustain existing services and promote new facilities. This is highlighted within paragraph 79 of the NPPF which states the need for villages to grow and thrive, especially where development will support local services. With this in mind, sites such as Hillcrest in Stiffkey should be considered for small scale housing development to help make the plan more consistent with national policy and ultimately more sound. Furthermore, it is more effective for NNDC to reach their housing targets through planned development across the district rather than relying so heavily on windfall development likely resulting in unacceptable ad hoc countryside proposals.	Disagree. The Council does not it necessary to amend Policy SS1 as requested. The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79). The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. Policy SS2 sets out the criteria for development within villages such as Stiffkey, which includes affordable housing and Policy SS3, which relates to Community-Led Development. As such, small scale development appropriate to the countryside policy area would be able to come forward. Conclusion No change proposed.	No	N/A
LPS451	Mr Nick Moys, Brown & Co (Raynham Farm Company Ltd)	4.1 Spatial Strategy	Policy SS1	It is suggested that provision be made in the policy to allow small scale housing development within smaller villages. Criteria could be included to define the relationship of sites to existing developed areas, for instance by allowing infilling and rounding off, and to require development to respect local form and character. Such policies have been adopted by a number of local authorities, including the neighbouring authority of Breckland, where Local Plan Policy HOU05 makes provision for small scale housing development in small villages without settlement boundaries.	Disagree. The Council does not consider it necessary to amend Policy SS1 as requested. The policy includes flexibility for incremental growth compatible with the form and character of the villages and its wider setting. The updated Background Paper 2 Distribution of Growth provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth.	No	N/A

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					<p>The amount of growth allocated for Small Growth Villages also takes account of the limited capacity of these settlements in terms of their constraints; character and level of facilities, alongside the local housing need.</p> <p>Conclusion No change proposed.</p>		
LPS508	Mr John Grieves	4.1 Spatial Strategy	Policy SS1	<p>The village of Aldborough no longer has sufficient facilities to comply with NNDC's definition as a Service Village. In recent years closures of retail outlets & reduction of transport services has left just one post office which has taken over the function of a small village shop BUT has already survived one listing for closure by Royal Mail & who knows when they may next attempt to do so. There is a modern antiques shop which has irregular opening, often once a week or by appointment. Employment is limited to the farms, one pub, one garage & the Post office. The butcher, the Spar shop, one Antique shop & one pub having closed & the buildings converted to residential use. The bus service has reduced to the extent that transport to other towns/places of employment does not exist for arrival at a place of employment &/or return home for normal working hours.</p>	<p>Disagree. The Council does not consider it necessary to remove Aldborough as a Small Growth Village, as requested. The updated Distribution of Growth Background Paper (2022) has reviewed all of the Small Growth Villages and Aldborough has the required level of services and facilities (three key services and five secondary and desirable services) to be identified as a Small Growth Village.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS749 LPS750	Mr Philip Atkinson, Lanpro (Glavenhill Strategic Land)	4.1 Spatial Strategy	Policy SS1	<p>Glavenhill is seeking amendments to emerging policies SS1, SS2 and HOU1 in the emerging Local Plan to recognise the potential of Badersfield to deliver new and innovative economic growth enabled by additional new housing provision in this sustainable growth location. My client is also seeking the removal of references to Badersfield being an unsustainable location for new growth within NNDC area in the emerging Local Plan. This is because being the acknowledged third largest employment centre in the District and well served by existing housing and day-to-day facilities this simply cannot be the case that it is unsustainable.</p> <p>Glavenhill consider that Badersfield is a good location for housing and employment growth and supports the strategic aim as outlined in paragraph 8.0.1 of the emerging Local Plan that states "Delivering sustainable growth requires that housing growth is matched with improved employment opportunities close to where people live."</p> <p>Glavenhill control land to the north and east of the village of Badersfield adjacent and to the north of Scottow Enterprise Park (SEP). Glavenhill has previously promoted this land for a mix of private and affordable housing, elderly and specialist care, new community services and employment uses at various stages in the emerging Local Plan's evolution. My client is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the SEP.</p> <p>Glavenhill through their previous Local Plan submissions, detailed in their Vision and Delivery Document submitted in June 2019, confirms that the village of Badersfield is a sustainable location for planned housing and employment</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS1. The response is in relation to the promotion of alternative sites. A number of alternative site options have been considered throughout the development of this plan.</p> <p>Conclusion No change proposed.</p>	No	N/A

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				growth. As explained previously the village benefits from a range of core services including convenience retail and post office, place of worship and a public house as well as major employment at the SEP and HMP Bure. Further services such as high schools, medical and dental practices, sports grounds, libraries and emergency services are also within a short distance.			
LPS760	Lyndon Swift (Weybourne Parish Council)	4.1 Spatial Strategy	Policy SS1	<p>Services & Facilities</p> <p>The provision of 452 additional houses in the small growth villages will put increased pressure on infrastructure and facilities, but as they are small-scale developments, this won't trigger an assessment of the additional services that will be required.</p> <p>If most new homes in the villages and coastal areas are likely to be occupied by retired people, they will put increased pressure on healthcare provision, above and beyond that for an average age distribution</p> <p>Ambulance response times are already woefully inadequate in rural areas. Increased housing will increase demand, especially as it is forecast that many of the new homes will be occupied by retirees who are more likely to need emergency hospital treatment than the population as a whole, while the higher population will increase traffic, thereby increasing the ambulance response times even further.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS1.</p> <p>Major development should be informed by the Health Protocol. No specific modification requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS675	Ms Laura Joyce (Natural England)	4.1 Spatial Strategy	Policy SS1	<p>Natural England supports the strategic framework set out in Policy SS1 and highlight the recommendation of cross referencing all types of developmental growth with Policy ENV1 to ensure protected landscapes are fully considered in all proposals.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS1 and supporting text as requested. Policy SS1 makes specific reference to the Norfolk Coast AONB in Criterion 1, where an agreed modification PMIN/SS1/03 aligns the relevant text to that of policy ENV1 for consistency. The local plan should be read as a whole and consequently, it is considered that development proposals that may impact the AONB would be fully considered. No specific modification requested.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS805	Mr Steve Kosky, Turley Planning (Pigeon Investment Management)	4.1 Spatial Strategy	Policy SS1	<p>On balance, the spatial strategy, including the primary site allocations in the Draft Local Plan is not considered to be sound, being neither positively prepared, justified, effective nor consistent with National Policy. This is reflected by the disproportionate allocation of new homes across the Large Growth Towns away from Cromer in favour of Fakenham and North Walsham and the significant number of delivery issues which have been identified with the above strategic allocations made in these two settlement locations.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS1. The representation centres on specific site allocations within Large Growth Towns and does not object to the principle of any of these settlements being identified as Large growth Towns. As such, there does not appear to be any direct discord with Policy SS1.</p> <p>Conclusion No change proposed.</p>	No	N/A
PC020	North Norfolk District Council	4.1 Spatial Strategy	Policy SS1 Criterion 3(a)	Add an 'and' to the end of the criterion 3a. for consistency.	<p>Agree to modification as requested.</p> <p>3a. The site immediately abuts the defined Settlement Boundary; and,</p>	Yes	PMIN/SS1/04

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LPS312 LPS311	Alex Munro, Armstrong Rigg Planning (Westmere Homes)	4.1 Spatial Strategy	Policy SS1, Criterion 3	<p>We suggest the following amended wording of sub-section 3 of Policy SS1 to ensure that it is effective in ensuring the following:</p> <p>The delivery of a minimum number of dwellings across the Small Growth Villages tier, a figure which will be dictated by any amendments to the overall housing requirement of the plan and would then represent a vital and sizeable component of the district's objectively assessed housing need;</p> <p>Development at each village which is responsive to the needs of the community at any given time between now and the end of the plan period in 2036; and</p> <p>The identification of a range of sites that will deliver a sufficient mix of both market and affordable housing whilst viably securing appropriate social infrastructure to the benefit of the community.</p> <p>Criterion 3. Outside of the defined boundaries of Small Growth Villages residential development will be permitted only where all of the following criteria are satisfied:</p> <ol style="list-style-type: none"> a. The site immediately abuts the defined Settlement Boundary: and b. The number of dwellings combined with those already approved since the date of adoption does not increase the numbers of dwellings in the defined settlement by usually across all of the Small Growth Villages by more than 6% XXXX* dwellings., as outlined in Table 2 'Small Growth Villages Housing Apportionment'. Once this figure is exceeded residential-led will only be acceptable where it demonstrably meets a localised housing need, demonstrated by way of an up-to-date housing need survey, and accords with all other criteria of this policy; c. The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historical character; and d. Safe and convenient access can be provided; and e. The proposal incorporates substantial community benefits which may include (as examples), including necessary infrastructure and service improvements, and improved connectivity to the village and wider GI network, or an uplift in affordable housing above the requirement set out in Policy HOU2 where it meets a demonstrable need.; and f. In the case of sites in excess of 0.25 hectares, the site, together with any adjacent developable land, has first been offered to a Registered Social Landlord on agreed terms which would allow its development for affordable homes, and such an offer has been declined. 	<p>Disagree. The Council does not consider it necessary to amend Policy SS1, Criterion 3 as requested. However, part modification made to Criterion 3e. – see PMIN/SS1/01.</p> <p>The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79)</p> <p>The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. The amount of growth allocated for Small Growth Villages also takes account of the limited capacity of these settlements in terms of their constraints; character and level of facilities, alongside the local housing need.</p> <p>Conclusion No change proposed.</p>	No	N/A

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				*Figure to be determined as a proportion of the overall residual growth required by the plan			
LPS338	Miss Natalie Beal,	4.1 Spatial Strategy	Policy SS1, Criterion 3(c)	Propose amendment to Policy SS1 Criterion 3c. to add reference to The Broads as follows: 'The proposal is small scale, incremental growth compatible with the form and character of the village and its landscape setting in terms of siting, scale, design, impact on heritage assets and historic character and the Broads; and'	Comment noted. The Council does not consider it is necessary to amend Policy SS1, Criterion 3c as requested. Policy SS1 is a strategic policy which should be read as part of the wider plan, where policies relating to the protection of designated built and landscape assets, including landscape character would be considered under other policies of the plan, including Policies ENV1 and ENV2. As such, it is not necessary to amend the Policy wording as proposed. Conclusion No change proposed.	No	N/A
LPS266 LPS265	Lois Partridge, Sworders	4.1 Spatial Strategy	Policy SS1, Criterion 3(e) & (f)	Policy SS1. It is suggested that criteria 3e) and f) should be removed from Policy SS1, to provide a more positive policy context for small scale development to come forward adjacent to the settlement boundary of Small Growth Villages. Policy SS1 should allocate sites for residential development adjacent to SGVs. The lack of allocations in these villages weakens the Spatial Strategy and does not represent positive planning. Paragraph 4.1.7 of the Plan acknowledges that, in respect of Small Growth Villages:	Disagree. The Council does not consider it necessary to remove Criterion 3e and 3f / amend the Small Growth Village housing apportionment to Policy SS1 as requested. The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79) The plan provides for proportionate growth across identified Small Growth Villages. The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy and in particular, explains the rationale for the indicative housing delivery apportioned to Small Growth Villages, in line with Paras. 69a and 79 of the NPPF. The approach seeks a fair and equitable distribution through delivery of growth in each identified Small Growth Village, which equates to approximately 6% growth. Table 2 clearly provides the Housing Apportionment for each Small Growth Village, which is considered to provide a reasonable level of certainty to the potential growth of the settlements. Conclusion No change proposed.	No	N/A
LPS383	David Jones, Armstrong Rigg Planning (DL Ritchie Will Trust)	4.1 Spatial Strategy	Policy SS1, Criterion 4	Support general approach to Policy SS 1, with recommendation to make it clear that the Countryside Policy Area includes all land outside of defined settlement boundaries. The policy currently implies that this area does not include land adjoining the growth towns and villages. We recommend the following amendment to ensure that the plan is effective and therefore sound. Criterion 4. The rest of North Norfolk, including all settlements not listed above and all land located outside of designated Settlement Boundaries, is designated as Countryside Policy Area where development will be limited to those types allowed for in Policy SS 2 'Development in the Countryside'."	Comments noted. The Council does not consider it necessary to amend Policy SS1, Criterion 4 as requested. Criterion 4 clearly states 'the rest of North Norfolk' and as such, there is considered to be no further clarification required. Conclusion No change proposed.	No	N/A
PC118	North Norfolk District Council	4.1 Spatial Strategy	Table 2 Small Growth Villages Housing Apportionment	Updated Table 2 to align with using estimated ONS population projections 2016 in establishing housing allowances.	Agree modification, as proposed. Updated Table 2 Small Growth Village Housing Apportionment detailing amended indicative housing allowances.	Yes	PMIN/SS1/05

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LPS85	Dr Nicholas Palmer (Compassion in World Farming)	4.2 Development in the Countryside		<p>The submission is from Compassion in World Farming, a non-governmental organisation seeking to reduce and ultimately end intensive farming practices, on both animal welfare and environmental grounds.</p> <p>The draft Local Plan includes a welcome stress on sustainability, but there is no reference to whether proposed farming developments are in keeping with the direction of national planning and Government codes of practice.</p> <p>This is short-sighted, since it leaves farming businesses and the surrounding community exposed to the impact of foreseeable change. A new development may be justifiable in itself today, yet no longer viable when existing policy directions are followed by legislation, resulting in substantial agricultural development being wasted.</p> <p>In particular, there is a risk in allowing the continuing development of large intensive farms, dependent on continuing growth in demand for meat. The Government National Food Strategy (NFS) proposes a reduction in meat consumption of 30% of the next decade.[1] If the Government delivers on this, the financial basis for expansion of meat farming will be undermined.</p> <p>The Council should be able to consider whether to approve farming planning applications that envisage practices that breach Government codes of practice but may not yet be actually unlawful. While councillors cannot be expected to be familiar with every aspect of secondary legislation, objections that draw attention to such issues should be given serious consideration, since it is against the interest of the community and indeed the farm to approve a planning application for a development that breaches government guidelines – both for the Council’s reputation and because the farm is unlikely to be sustainable on that basis.</p> <p>To give two examples which may be raised in connection with specific applications:</p> <p>Some new developments for pig farms are designed with a waste system which cannot deal with the amount of manipulable material e.g. straw that farmers are required to use by law. The outcome may be either failure to treat the animals lawfully or disposal of waste by means not stated in the application.</p> <p>Intensive poultry farms typically use fast-growing breeds whose size exceeds the capacity of the farm as the birds grows. The recommended approach to avoid this is to use breeds consistent with the size of the farm, but many farms still use “thinning” (removal of birds not yet fully grown for early slaughter) as a way around the problem. This is explicitly against the recommended Government code of</p>	<p>Comments noted. The Council does not consider it necessary to amend the section 4.2 Development in the Countryside. The representation does not object directly to the Policy wording or supporting text, but is concerned with farming practices and in particular, in relation to the longevity of some agricultural development proposals. Relevant proposals would be subject to project level HRA and Impact Assessments. No specific modification has been suggested.</p> <p>Conclusion No change proposed.</p>	No	N/A

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				<p>practice, and if the code in due course becomes law, farms designed with that model will struggle to be viable.</p> <p>The planning authority cannot reasonably be expected to speculate on future developments not yet signposted by government, but it is in the interest of the community as a whole to avoid development of businesses likely to become unviable because of stated Government policy.</p> <p>[1]https://www.nationalfoodstrategy.org/the-report/ - page 11</p> <p>We propose, therefore, the addition of one paragraph to the section on 'Development in the Countryside':</p> <p>'In assessing agricultural planning applications, the Council may take into account the consistency of the proposed development with current or reasonably expected Government policy and codes of practice.'</p>			
LPS323	Roger Welchman (Armstrong Rigg Planning)	4.2 Development in the Countryside	Policy SS2	<p>We consider this additional criteria which is consistent with that contained in the Regulation 18 version of the draft Local Plan would, in the absence of the certainty provided by allocations at small growth villages, provide an important additional source of housing. It would provide for both a greater degree of flexibility in the sources of supply, given the dispersed rural nature of North Norfolk and contribute to the support that national policy conveys to rural housing.</p> <p>k. 'proposals for small scale development appropriate to their setting in locations offering opportunities for sustainable growth, which would result in the in-filling or rounding off in a built up area.'</p>	<p>Disagree. The Council does not consider it necessary to amend Policy SS2 as requested.</p> <p>Policy SS1 provides a clear settlement hierarchy for sustainable growth and identifies the land and settlements not listed in the hierarchy as being in the Countryside Policy Area. The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79). The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy that has been identified. In addition, Policies SS2 and SS3 and HOU3 provide a clear framework for growth in the Countryside, and in particular to promote affordable housing. The proposed additional Criterion k. would nullify these policies and create an ad hoc approach to development in the Countryside.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS394	Mr Garth Hanlon, Savills UK Ltd (Holkham Estate)						
LPS64	Dr Bianca Finger-Berry	4.2 Development in the Countryside	Policy SS2	<p>Designating NW52 as employment land is not in line with this policy on development in the countryside, it does not fulfil any of the criteria set out here and should therefore not happen. It is currently agricultural land and used at certain times of years as a campsite.</p> <p>Site NW52 should not be allocated for employment land.</p>	<p>Comment noted. The representation does not relate to the specific Policy SS2, but to the allocation of NW52 as employment land not meeting any of the criteria within Policy SS2.</p> <p>The Council has a duty to allocate sites to enable sustainable growth. NPPF Para. 86 e) allows for the allocation of appropriate edge of centre sites that are well connected to the town centre where suitable and viable town centre sites are not available. The allocation of site NW52 has been fully informed by the North Norfolk Housing and Economic Land Availability Assessment (HELAA) Part 2 – Assessment of Employment Land, April 2018 and is considered to be a suitable site in line with national policy and guidance.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS339	Miss Natalie Beal (Broads Authority)	4.2 Development in the Countryside	Policy SS2	<p>There is a conflict with NPPF 79 "To promote sustainable development in rural areas, housing should be located where</p>	<p>Disagree. The representation does not relate specifically to Policy SS2, but is concerned that the Policy is too restrictive in relation to</p>	No	N/A

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				<p>it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this, will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby."</p> <p>There are far too many villages which have inappropriately been classified as "Countryside". One (Scottow) has a population of 1,785. There are others with modest populations e.g. Binham, which has less than 300 inhabitants, which currently has services which are unlikely to be sustainable in the longer term.</p> <p>There is a need to re-visit the villages which have been classified as "Countryside" with a view to making them more inclusive so that they can "thrive and grow" instead of "writing them off".</p>	<p>Para. 79 of the NPPF and that too many villages are identified in the Countryside Policy Area.</p> <p>Policy SS1 provides a clear settlement hierarchy for sustainable growth, where Policies SS2 and SS3 and HOU3 provide a clear framework for growth in the Countryside, which seeks to promote affordable housing, in particular. The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79). The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy that has been identified.</p> <p>Conclusion No change proposed.</p>		
LPS394	Mr Garth Hanlon, Savills UK Ltd (Holkham Estate)	4.2 Development in the Countryside	Policy SS2	<p>The proposed criterion I. below acknowledges the important role large rural estates like the Holkham Estate play in North Norfolk in supporting a prosperous rural economy. The importance that the Holkham Estate plays in this respect is underlined when one considers the important contribution they make in delivering against each and every one of the elements (a-d) expressed under paragraph 84 of the NPPF. This additional criteria to the policy will enable the Estate to plan for future development needs in a jointly agreed master-planned way and provide for a greater degree of certainty for the Estate, the Council, the local community and other relevant stakeholders. This will also enable the Estate to more clearly plan and realise its ambition to deliver and manage housing schemes which provide for local community needs.</p> <p>Policy SS2 should be amended as follows:</p> <p>I. 'Development proposals contained in rural estates which are in accordance with an Estate Masterplan which has been endorsed by North Norfolk District Council.'</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS2 as requested.</p> <p>An estate masterplan would need to accord with the Local Authority local plan policies.</p> <p>Policy SS2 is a strategic policy that accords with Para. 84 of the NPPF, by including all of the types of development covered within the criteria that promotes the rural economy. These include criterion a. use and development of land associated with agriculture or forestry, g. extensions to existing dwellings and businesses, h. re-use of existing buildings and i. new employment generating development where a need is demonstrated and alternatives sites within defined settlement boundaries are shown not to be available.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS537	Mr Alastair Curran, Planning Places Ltd (Ilex Homes)	4.2 Development in the Countryside	Policy SS2	<p>Policy SS2 of the proposed Local Plan is inconsistent with national policy, is not positively prepared, is unjustified, and ineffective.</p> <p>Policy SS2 supports developments adjacent to 'small growth villages' but does not support sustainable development adjacent to large growth villages, small growth towns, large growth towns, or existing hamlets and other service areas. The policy acknowledges an understanding of rural housing needs, through the support in principle for small-scale development for small growth villages, yet it does not apply this fairly across the proposed strategy. It also questions why this strategy is acceptable in small growth villages, but not adjacent to the urban boundary in large growth towns, such as Holt, for example.</p>	<p>Disagree. The Council does not consider it necessary to amend Policy SS2.</p> <p>Policy SS1 provides a clear settlement hierarchy for sustainable growth and identifies the land and settlements not listed in the hierarchy as being in the Countryside Policy Area. The local plan aims to deliver the quantity of homes necessary to meet the assessed needs of the district. The NPPF requires Plans to promote sustainable development and in particular where it will enhance and maintain rural services (NPPF para 79). The updated Distribution of Growth Background Paper provides the methodology to justify the settlement hierarchy that has been identified. In addition, Policies SS2 and SS3 and HOU3 provide a clear framework for growth in the Countryside, and in particular to promote affordable housing.</p>	No	N/A

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				<p>North Norfolk relies upon windfall development to deliver its housing need for the plan period, yet the plan relies upon a small number of small and medium sized allocations, and very limited support for windfall development in certain locations. Therefore, this limited growth is not as effective as it could be in securing appropriate sustainable housing for the district, across the district to support existing communities.</p> <p>To make the policy more sound, through greater compliance with the NPPF, it is postulated that SS2, should support developments adjacent to other settlement boundaries, not just 'small growth towns.' Specifically, support should be provided for greater flexibility in helping small communities grown, either through site specific allocations, or through facilitating windfall proposals adjacent to existing communities.</p>	<p>The response relates to the difference in approach to development on the edges of the Small Growth Villages and the higher order settlements within Policy SS1, where sites have been allocated. All aspects of future supply including windfall allowances and growth in Small Growth Villages have been carefully considered and evidenced.</p> <p>No specific modification has been suggested.</p> <p>Conclusion No change proposed.</p>		
LPS323	Roger Welchman (Armstrong Rigg Planning)	4.2 Development in the Countryside	Policy SS2, Criterion (c)	<p>To ensure the policy is positively prepared making as much use as possible of previously developed land consistent with national policy, the policy should be changed to:</p> <p>'c. affordable homes, replacement dwellings, replacement of existing buildings/redevelopment of previously developed sites, sub division of dwellings, essential rural workers accommodation;'</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS2, Criterion c. as requested.</p> <p>The use of previously developed land is implicit in the types of development set out in many of the criteria of the policy.</p> <p>Conclusion No change proposed.</p>		
LPS394	Mr Garth Hanlon, Savills UK Ltd (Holkham Estate)						
LPS48	Dr Victoria Holliday	4.2 Development in the Countryside	Policy SS2, Criterion (c)	<p>The new ability to subdivide houses in the countryside to more than one dwelling. This is unsustainable as it will create a greater number of more isolated dwellings and associated car journeys to access services.</p> <p>The new ability to subdivide houses in the countryside to more than one dwelling should be removed from this policy.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS2 Criterion c. as requested.</p> <p>The principle of subdivision of existing dwellings in the countryside is specifically accepted at Para. 80 d). of the NPPF. Therefore, Criterion c. is in accordance with national policy and guidance.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS206	Mrs Gemma Harrison (Cley Parish Council)	4.2 Development in the Countryside	Policy SS2, Criterion (c)	<p>Cley Parish Council OBJECT to the sub-division of existing housing stock in the countryside. This could lead very quickly to a sudden increase of houses in the countryside with the associated additional car journeys. North Norfolk does not lend itself for sustainable travel in the countryside, public transport routes are poor, ambulance response times are below target and North Norfolk has a predominantly elderly population. The District Council has declared a climate change emergency and therefore this proposed policy is unsound and will lead to an increased carbon footprint, further compound rural isolation and create added pressure on the existing emergency services.</p> <p>Remove this new policy criterion to split up dwellings in the countryside.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy SS2 Criterion c. as requested.</p> <p>The principle of subdivision of existing dwellings in the countryside is allowed at Para. 80 d). of the NPPF. Therefore, criterion c. is in accordance with national policy and guidance. Any such planning application would need to accord with all of the other relevant policies within the plan, when submitted.</p> <p>Conclusion No change proposed.</p>	No	N/A

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LPS48	Dr Victoria Holliday	4.2 Development in the Countryside	Policy SS2, Criterion (f)	It is important to maintain the wildness and tranquillity of our countryside in order to make it attractive to residents and visitors. Too much tourism development will suburbanise and domesticate the landscape. Development for recreation and tourism should be carefully considered bearing the Landscape Character Assessment in mind.	Comments noted. The Council does not consider it necessary to amend Policy SS2 Criterion f. The local plan must be read as a whole and as such, a number of policies would be triggered in relation to the development of recreation and tourism, including Policies HC2, E6, E7, E8 and E9, where a countryside location would also require consideration of landscape policies, including Policy ENV2, as a minimum. Conclusion No change proposed.	No	N/A
LPS257	Mr Michael Rayner (CPRE Norfolk)	4.2 Development in the Countryside	Policy SS2, Criterion (f)	We are concerned about the ambiguity of including category f, 'recreation and tourism' under this policy. That could be interpreted as meaning that new housing for holiday accommodation would be permitted under this policy. It is unclear what is meant by this form of development, especially as no further explanation is provided in the supporting text. Clarify point f so that it is clear this does not refer to housing/accommodation for recreation and tourism.	Comments noted. The Council does not consider it necessary to amend Policy SS2, Criterion f. as requested. There is a specific policy, Policy E6 that addresses these matters. Conclusion No change proposed.	No	N/A
LPS477	Mr Jake Lambert, Bidwells (Crisp Malting Group)	4.2 Development in the Countryside	Policy SS2, Criterion (g)	To ensure consistency between Policy SS2 and Policy E3, it is considered that the following amendments are required to Policy SS2. Without these amendments, it is considered that the disconnect between Policy SS2 and Policy E3 could render criterion g of SS2 ineffective and in conflict with Paragraph 35(c) of the NPPF. g. extensions to existing dwellings and businesses; h. expansion of existing businesses in accordance with Policy E3;	Disagree. The Council does not consider it necessary to amend Policy SS2, Criterion g. as requested. Policy E3 relates to new employment development and the conversion and redevelopment or change of use of premises outside of designated employment areas. This policy is not in conflict with Policy SS2, criterion g. which allows for extensions to existing dwellings and business in the Countryside. Conclusion No change proposed.	No	N/A
LPS128	Mrs Gemma Harrison (Holt Town Council)	4.2 Development in the Countryside	Policy SS2, Criterion (h)	Holt Town Cllrs are concerned with the proposed new policy to sub-divide existing dwellings in the countryside to create multiple dwellings. This will increase car journeys, and may lead to an increase in rural isolation and health implications, including inhibiting emergency responses times. Remove criterion h altogether.	Comments noted. The Council does not consider it necessary to amend Policy SS2 Criterion c. as requested. The principle of subdivision of existing dwellings in the countryside is allowed at Para. 80 d). of the NPPF. Therefore, criterion c. is in accordance with national policy and guidance. In the same respect criterion h. aligns with Para. 80 c) of the NPPF. Any such planning application would need to accord with all of the other relevant policies within the plan, when submitted. Conclusion No change proposed.	No	N/A
LPS370	Ms Erica Whettingsteel (Glavenhill Strategic Land)	4.3 Community-Led Development	Policy SS3	Policy is unnecessary and should be deleted	Comments noted. The Council does not consider it necessary to amend the policy as requested. The approach facilitates supports and empowers communities to bring forward appropriate community led development. Conclusion No Change proposed	No	N/A

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LPS676	Ms Laura Joyce (Natural England)	4.3 Community-Led Development	Policy SS3	We recommend that Policy ENV4 is referenced in Policy SS3 to ensure designated sites and biodiversity opportunities are considered fully in community-led development	Comments noted. The Council does not consider it necessary to amend the policy as requested. Proposals will be assessed against the Local Plan and development framework as a whole. Conclusion No Change proposed	No	N/A
LPS528	Mr Thomas Clare, NHS Norfolk & Waveney CCG (ICS Estates)	5.1 Health & Wellbeing	5.1	Any reference to the STP should now be replaced with the ICS. I would also like to inform you that the Planning in Health protocol referred to in the plan is currently under review in case you would like to reference it being updated in the plan	Comments Noted. References to the Sustainable and Transformation Partnership, STP which has amalgamated into to the Norfolk and Waveney Integrated Care System (ICS), which came into legal effect from July 2022 will need to be updated throughout the document. The ICS is an umbrella body bringing together the organisations planning, buying and providing publicly-funded healthcare to the population of the area. It also recognizes the consolidation of the five Clinical Commissioning Groups (CCGs) into the Norfolk and Waveney CCG The Health Protocol is being reviewed through the Norfolk Strategic Framework and Duty to Co-operate. References will relate to the most recent adopted versions. Conclusion Agree to requested modification(s)	Yes	PMIN/5.1/01
PC105	North Norfolk District Council	5.1 Health & Wellbeing	5.1.3	Update reference from STP to ICS for consistency	Conclusion Agree to requested modification(s)	Yes	PMIN/5.1/02
PC107	North Norfolk District Council	5.1 Health & Wellbeing	5.1.6 5.1.7	5.1.6, Clarification that <u>major</u> development should be informed by the health protocol – alignment with policy. 5.1.7 clarifications on the thresholds around engagement with ICS required for reasons of alignment to policy and Health Protocol consistency	Modifications proposed for reasons of clarity, consistency and improve interpretation Conclusion Agree to requested modification(s)	Yes	PMIN/5.1/03 PMIN/5.1/04
LPS610	Ms Kerry Harris (Thornage Parish Council)	5.1 Health & Wellbeing	Policy HC1 5.1.6	It is requested, in the interests of soundness, if there is a wider policy intention is in para. 5.1.6 (due to NNDC's different demographic profile), then the wording in policy HC1(2) needs to be changed from "Major development" to "Residential development of all sizes and HIAs" [should be informed]. If not, then the qualification in HC1(2) to "major development" needs to be explained or substituted in the supporting text			
LPS49	Dr Victoria Holliday	5.1 Health & Wellbeing	Policy HC1	The Health Impact assessment needs to be undertaken independently by the NHS integrated Care system to assure social care, primary and secondary care capacity. The threshold of 500+ dwellings needs to be reduced to 250	Health care facilities, services and investment are important consideration in the suitability of North Norfolk. The approach was based on the previous version of the Health Protocol which has since been updated. The updated Health Protocol 2022 encourages Local Plans to contain policies to ensure health issues are considered in new development and supports the use of a Health Impact Assessment which is one mechanism to integrate health throughout the planning process. The planning practice guidance advises that HIA are a useful tool to use where there are expected to be significant impacts and can support the Council in discharging its duties to take appropriate action to improve healthy under the Health and Social Act 2012. The continued enhancement of health provision, the fact that the majority of the allocations contained in the Local Plan are smaller than 500 units	Yes	PMIN/HC1/01

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					<p>coupled with the likely smaller scale of many proposals supports the reduction for the threshold to 250.</p> <p>Guidance on undertaking an HIA and the level of detail required are provided through the Health Protocol which the Council is a signatory to.</p> <p>Conclusion Agree to suggested modification (part)</p>		
LPS73	Mr John Long, (John Long Planning Ltd, Ms Emma Standard, Blakeney hotel)	5.2 Provision & Retention of Open Spaces	5.2 Policies Map	To make the Local Plan sound, the Blakeney Hotel suggests that the area of land in its ownership adjacent to The Pastures is excluded from the Blakeney 'Open Land Area' designation, and is either shown as 'White land' with no restrictive designation; or is specifically allocated for Hotel use, including parking. The Blakeney Hotel is content that the rest of The Pastures retains the open space designation as it is different in from, use and character and properly meets the designation's definition.	<p>The Council does not consider it necessary to amend the policy/policies mapping as requested (OSP154). The designation of the site as Open Land Area recognises the visual quality of the land and importance of the value of retaining the site as green open space within the village not only in terms of Policy HC2 but also the Conservation Area and AONB.</p> <p>Open space designations are supported by the review detailed in the Amenity Green Space Review 2019 and the Blakeney Conservation Area Appraisal & Management Plan adopted 2022. The AGS study justified the continuation of the whole of the Pastures to be designated as open land area. It's recognised that the key issue related to the Pastures is pressure from development but this does not warrant the designations removal which would be detrimental to the prevailing landscape character and openness. The current use of the site for parking is not lawful with planning permission refused and more recently refusal of a certificate of lawfulness.</p> <p>Conclusion No Change proposed</p>	No	N/A
PC026	North Norfolk District Council	5.2 Provision & Retention of Open Spaces	5.2.1	Clarification the paragraph starts with <i>it is one of a number – what is?</i>	<p>Modifications is proposed for reasons of clarity Change text to states to Policy HC2</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIN/5.2/01
LPS69	Dr Victoria Holiday	5.2 Provision & Retention of Open Spaces	Policy HC2	Development on valued open space will not usually be supported'. This should be more strongly worded to discourage loss of valued open space.	<p>Comments noted, valued open space includes designated and non-designated open space and the protection should not be limited to just visually important open spaces. Modification to criteria 5 and supporting text para 5.2.3 is proposed for reasons of clarity.</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIN/HC2/01 PMIN/5.2/02
LPS175	Mss Naomi Chamberlin, (Norfolk County Council)	5.2 Provision & Retention of Open Spaces	Policy HC2	NPS Property Consultants object to the inclusion of the land at Hempstead Road and A148 (Land off Swan Grove), Holt AGS/HLT02 OSP050 as Open Land Area and request this allocation is deleted. (on the basis that the site is not demonstrably special (NPPF para 102b) and does not meet the tests for Local Green space.)	The Council does not consider it necessary to amend the policy/policies mapping as requested. Open space designations are supported by the review detailed in the Amenity Green Space Review 2019, updated 2022. The designation of the site as Open Land Area recognises the qualities of the land and importance of retaining the site as green open space. The site is currently	No	N/A

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					designated on the Core Strategy Proposals mapping (electronic version) and further included in the submitted Holt Neighbourhood Plan Under Policy HOLT3. Conclusion No Change proposed		
LPS494 LPS367	Mr Mark Singer (Barton Willmore-Sutherland Homes) Mr Alan Presslee (Cornerstone Planning Ltd Sherringham House holdings)	5.2 Provision & Retention of Open Spaces	Policy HC2	Amendments to exiting Open land Areas in relation to Sherrington House as shown on the policies mapping to reflect extant planning permission Application No. PO/16/1725)	The Open land Area designation (OSP113) has already been amended in line with the planning permissions which have been granted. Areas which have subsequently been granted permission were removed and the designation accurately reflects the previous allocations and planning permissions. The residual land is retained as part of the Open Land Area Conclusion No Change proposed	No	N/A
LPS358	Mrs Sarah Hurry (Rudd Family)	5.2 Provision & Retention of Open Spaces	Policy HC2	Delete the "Open Land" designation on "Land off Warren Road" as the inaccessibility, function (including many buildings), existing TPO protection and other policies in the Local Plan make this proposal unjustified, unnecessary and inappropriate for the area it covers. Alternatively RE site the route of the boundary of the proposed open land so it can be clearly understood by physical features on the ground. We would propose the northern boundary is locked to an agreed distance (the width of Bernard Road) from the southern boundary fence to run part-way immediately alongside the bridleway to where it meets our Bridge Road driveway. This would ensure the many developed buildings, driveway and the visually inaccessible/unimportant areas of our curtilage are outside the "Open Land" designation as its clearly inappropriate, unjustified and unnecessary for them to be included. 1 Delete the "Open land" designation and restore all of High Kelling to countryside.	The Council does not consider it necessary to amend the policy/policies mapping as requested (Ref OSP195). This site is designated as open land area on the former proposal mapping and is carried forward into the Local plan policies mapping further details can be found in the updated 2022 AGS study section 11 Conclusion No Change proposed	No	N/A
LPS252 LPS328	Ms Jane Armstrong Mr Alistair Lindop	5.2 Provision & Retention of Open Spaces	Policy HC2	The extent of OSP154 – (The Pastures Blakeney) should be revised by removing the southern parcel of land (the garden of 39 New Road) from the designation.	The Council does not consider it necessary to amend the policy/policies mapping as requested (OSP154). The designation of the site as Open Land Area recognises the visual quality of the land and importance of the value of retaining the site as green open space within the village not only in terms of Policy HC2 but also the Conservation Area and AONB. Open space designations are supported by the review detailed in the Amenity Green Space Review 2019, updated 2022, the Blakeney Conservation Area Appraisal & Management Plan adopted 2022. The AGS study justified the continuation of the whole of the Pastures to be designated as open land area. Even though it is private land, it still is a component part of the Pastures that is a key area of open green space within the village. Sequential aerial mapping shows that the boundary of the area has	No	N/A

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					<p>been hedged, subdivided and vegetated in recent years to purposefully create visual separation. The site has been recently subject to an appeal which was dismissed (Ref: APP/Y2620/W/16/3146342). On the recognition that The designation of the site as Open Land Area recognises the visual quality of the land and importance of the value of retaining the site as green open space within the village not only in terms of Policy CT1 but also the Conservation Area and AONB.</p> <p>Conclusion No Change proposed</p>		
PC027	North Norfolk District Council	5.3 Provision & Retention of Local Facilities	5.3.2	Add sustained period of at least 12 months	<p>Modifications is proposed for reasons of clarity Change text to state a continuous period of 12 months.</p> <p>Conclusion Agree to requested modification</p>	YES	PMIN/5.3/01
LPS282	Mrs Clare Stagg	5.3 Provision & Retention of Local Facilities	Policy HC3	I would like the policy to be strengthened so it protects existing amenity and allows for reasonable expansion and housing is for locals who will reside full time in the village.	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested. The comment does not relate to the policy proposed which covers new community facilities and services.</p> <p>No specific modification has been suggested</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS325	Roger Welchman (Armstrong Rigg Planning, Kelling Estate)	5.3 Provision & Retention of Local Facilities	Policy HC3	<p>Recommended Amendment</p> <p>2. Development proposals that would result in the loss of premises currently, or last used for, important local facilities (1) will not be permitted unless:</p> <p>a. alternative provision of an equivalent or better quality facility is available in the vicinity a suitable location capable of serving the relevant needs, or will be provided and made available prior to commencement of redevelopment; or</p> <p>b. it can be demonstrated that there is no reasonable prospect of retention of the facility; and, if it is a commercial operation:</p> <p>a. it has been marketed for a period of at least 12 months; (2)</p> <p>b. a viability test has demonstrated that the use is no longer viable; and,</p> <p>c. that all reasonable efforts have been made to sell or let the property at a realistic market price for a realistic period (3).</p> <p>Footnotes Recommended Amendments</p> <p>4. Important local facilities include a primary school, convenience store, bank, post office, public house, petrol filling station, public hall or indoor sports facility, theatres and cinemas and art centres other cultural facilities, and specialist elderly persons accommodation and Dr's surgeries health care facilities</p>	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested. The specific wording represents a consistent approach throughout the Plan.</p> <p>Conclusion No Change proposed</p>	No	N/A

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				<p>2. To accord with best practice guidance published by the LPA.</p> <p>3. Demonstrated as commercial market price by local valuer to the satisfaction of the Council.</p>			
LPS251	Mr Tom Clarke (Theatres Trust)	5.3 Provision & Retention of Local Facilities	Policy HC3	<p>we are supportive of the thrust of this policy, we consider it should be refined in order to enhance its effectiveness.</p> <p>We suggest the following amendments in order to improve the effectiveness of the policy as cited above and to enhance protection for the district's valued facilities:</p> <p>2.Development proposals that would result in the loss of premises currently, or last used for, important local facilities(1) will not be permitted unless</p> <p>a. alternative provision of an equivalent or better quality facility is available in the vicinity or will be provided and made available prior to commencement of redevelopment; or a. the facility is being re-provided to at least an equivalent standard in a location accessible to existing users and made available prior to loss of the existing facility</p> <p>b it can be demonstrated that there is no reasonable prospect of retention of the facility; and, if it is a commercial operation:</p> <p>a. it has been marketed for a period of at least 12 months;(2) b. a viability test has demonstrated that the use is no longer viable; and, a viability test has demonstrated that the use is no longer viable and could not be made viable under alternative models of operation</p> <p>c. that all reasonable efforts have been made to sell or let the property at a realistic market price(3).</p>	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested in relation to the suggested modification 2 a – it is two specific and would allow for little to no flexibility in rural communities such as North Norfolk.</p> <p>Modification 2 b,b with regards viability is proposed for reasons of clarity consistency and to improve interpretation.</p> <p>Conclusion Agree to requested modification (part)</p>	Yes	PMIN/HC3/01
LPS251	Mr Lyndon Swift (Weybourne parish Council)	5.3 Provision & Retention of Local Facilities	Policy HC3	<p>The facility should be offered to the community to run. There are many examples of successful community-run shops, for example. The Plan should take into account the impact of the closure of a key service or facility, with changes to the permitted level of development if the closure effectively moves the settlement into a different development category</p>	<p>Comments noted. The issue of community led development is supported. Community Land trusts that operate community facilities are supported by the council and encouraged through this Plan. The level of Service provision is detailed in Background paper No2 – Distribution of Growth.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS755	Ms Anna Comb (NHS property Services)	5.3 Provision & Retention of Local Facilities	Policy HC3	<p>....In order to enable the NHS to be able to promptly adapt its estate to changing healthcare requirements, it is essential that all planning policies enable flexibility within the NHS estate. On this basis, NHSPS would advise the Council that policies aimed at preventing the loss or change of use of community facilities and assets, where healthcare is included within this definition, can have a harmful impact on the NHS's ability to ensure the delivery of facilities and services for the community. Where such policies are overly restrictive, the disposal of surplus and unsuitable healthcare facilities for best value can be prevented or delayed, which in turn delays vital re-investment in the NHS estate.....</p>	<p>Comments noted. Health care facilities are important for the sustainability of North Norfolk. The approach is flexible and requires reinvestment in the district. Part 3 of the policy has been developed in consultation with NHS Property Services and aims to ensure flexibility in NHS estate to support the continuing investment in health and social care uses and facilitate the delivery of improved provision.</p> <p>Conclusion No Change proposed</p>	No	N/A

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				<p>Modification requested</p> <p>Where it can be demonstrated that health facilities will be changed as part of a wider NHS estate reorganisation programme it should be accepted that a facility is neither needed nor viable for its current use.</p> <p>Policies that prevent the loss or change of use of community facilities and assets, where healthcare is included within this definition, can hinder the NHS's ability to ensure the delivery of facilities and services for the community.</p>			
LPS529	Mr Thomas Clare (NHS Norfolk & Waveney CCG(ICS Estates))	5.4 Infrastructure Provision, Developer Contributions & Viability	5.4.11	Update reference from Norfolk and Waveney Sustainable and Transformation Partnership , STP to integrated Care System, ICS for consistency 5.4.11	<p>Conclusion</p> <p>Agree to requested modification(s)</p>	Yes	PMIN/5.4/01
PC028	North Norfolk District Council	5.4 Infrastructure Provision, Developer Contributions & Viability	5.4.12	<p>Unnecessary repetition of 'land' in sentence.</p> <p>Change to: 'In line with Government advice the purchase price of land must...'</p>	<p>Modifications is proposed for reasons of clarity</p> <p>Remove duplication</p> <p>Conclusion</p> <p>Agree to requested modification</p>	Yes	PMIN/5.4/02
LPS642	Mr Lyndon Swift (Weybourne parish Council)	5.4 Infrastructure Provision, Developer Contributions & Viability	5.4.8	The Local Plan should exclude developments in the rural area apart from social housing	<p>Comments noted. The comment does not relate to the policy proposed specifically. Policy SS2 sets out the Council's strategic and overarching approach to supporting appropriate development tin the countryside.</p> <p>Conclusion</p> <p>No Change proposed</p>	No	N/A
LPS50	Dr Victoria Holliday	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	The timing of providing infrastructure for developments (eg doctor's surgeries, schools, roads) is critical. It should be in place before the development is built. Otherwise there is intolerable pressure on infrastructure for both the existing and additional population.	<p>Support noted. The policy sets out the policy framework to enable early and appropriate infrastructure with the delivery of the development. In addition the site allocations policies set out where necessary specific requirements which would be subject to any s106 agreements and specific delivery conditions as part of any legal agreement. It should be noted that the delivery of larger scale infrastructure is not something that the Council or developers can necessarily do alone and in many cases it requires an integrated approach. The Local Plan sets out the policy framework, including the requirement to assess the need for improved health faculties and co-ordination with the Integrated Care System (ICS) through the requirements of the Health Protocol. The Plan has also been developed with input from education and highway authority. The ambition of the Council is clear that infrastructure shall accompany developments and be in place when required. The Plan is supported by the Infrastructure Delivery Plan. The IDP will help ensure that the identified additional infrastructure and service needs are delivered in a timely, co-ordinated and sustainable way. It will be important that the Council continues to work in partnership with partners across the private, public and voluntary sectors to deliver the new local plan's provisions. Once adopted, the new Local Plan's policies and proposals will also enable the Council to highlight the infrastructure needs and bid for additional resource funding opportunities that may arise from Government and regional funding initiatives such as through the current and future Levelling Up Bid process, Housing Infrastructure Fund, HIF, Bids and also</p>	No	N/A

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LPS759	Mr Lyndon Swift (Weybourne Parish Council)			Amend to include "all developments to have a viability assessment" All new building should require improvements to roads and services PRIOR to any works commencing. Eg alterations to roads connecting our towns, additional carparks and toilet facilities, additional pavement provision in villages, dedicated cycle routes. There is an acute shortage of reliable and convenient public transport in rural areas, this promotes a dependency on the use cars	<p>seek greater representation in the county's strategic IDP and or wider economic plan through the LEP.</p> <p>The Council does not consider it necessary to amend the policy. The approach is in line with the NPPF, Para 58. Where a proposal is fully policy compliant there is no need to justify a departure from policy on viability grounds.</p> <p>The Council does not consider it necessary to amend the policy. The Plan promotes development In line with the NPPF. Planning obligations can and will only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. NPPF para 57.</p> <p>Conclusion Agree to requested modification (part) for reasons of clarity</p>		
LPS179	Andy Scales (Norfolk Constabulary)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	<p>The Local Plan recognises that future development within the District will place pressure and demand on existing infrastructure such as schools, open spaces, transport networks, health and community facilities. However, it fails to recognise the same pressure and demands in relation to police requirements. In mitigating additional demand there will be a requirement for new development, where necessary, to contribute toward the improvement of existing police infrastructure and facilities, to make development acceptable.</p> <p>To address the above, the Reg 19 version of the Local Plan in policy HC 4 needs to be revised to ensure soundness and consistency with the NPPF by making specific reference to contributions towards police infrastructure requirements with the following amendment (highlighted in caps, below)</p> <p>4 - In particular development will be expected to provide, or contribute towards the provision of:</p> <ol style="list-style-type: none"> infrastructure requirements as identified in the site specific proposals; the highest viable level of affordable the delivery of community infrastructure, including but not limited to education, healthcare, <u>POLICE</u>, libraries, community facilities, telecommunications; satisfactory <p>In addition, Table 4 should include specific reference to Police and the supporting text should equally reference the need for police infrastructure to ensure that this is clear to developers</p>	<p>Comments noted. The Council does not consider it necessary to amend the policy or table 4 as requested. The list is not exhaustive and does not prevent a case being made on an appropriate application. In line with the NPPF planning obligations will only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. NPPF para 57.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS357	Mr Allen Presslee (Cornerstone Planning ltd Norfolk Homes)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	<p>We have concerns about the apparently open-ended form of expected developer contributions in paragraph 4 of the, especially given the footnote that "the following list is not exhaustive". In the absence of a Regulation 123 List for the provision of infrastructure through CIL monies under the Community Infrastructure Levy Regulations 2010, we are concerned that there is insufficient clarity about the types, extents and expected contributions.</p>	<p>Comments noted. No specific modification has been suggested The Council does not consider it necessary to amend the policy. In line with the NPPF planning obligations will only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. NPPF para 57.</p>	No	N/A

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				References are made in the policy and supporting text to “healthcare” and “health provision”. It is noticeable that NHS England has latterly started to request financial contributions through planning applications, to address primary healthcare impacts arising from a proposed development. However, it is our view that financial contributions to doctor and dental surgeries (private businesses) is not a planning matter, and does not meet the tests under Regulation 122 of the Community Infrastructure Levy Regulations 2010. For doctor and dental practices, it is anticipated that the market will respond to the increased demands arising from proposed development. Consequently, broad policies that seek such (expressly or implicitly) should be avoided. As submitted, Policy HC4 is unsound as it neither justified, nor consistent with national policy	Conclusion No Change proposed		
LPS404	Sarah Hornbrook, Bidwells (ESCO Developments , Flagship Housing Group & Lovell Partnerships)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	<p>Infrastructure requirements associated with development proposals are often determined through local circumstances and through engagement with key stakeholders, such as the County Council’s Planning Obligations Team. The non-exhaustive list at Part 4 of the policy, therefore, appears to predetermine the infrastructure requirements that may arise from development in the District.</p> <p>To ensure that development proposals provide proportionate and necessary infrastructure contributions, and that the policy is effective in accordance with Paragraph 35(c) of the NPPF, the policy should be revisited to omit this list. i.e The list in Part 4 of the Policy should be omitted.</p> <p>Part 7 of the policy requires development proposals that seek to depart from policy on viability grounds to be supported by a viability assessment at validation stage. This element of the policy should be revised to reflect the fact that amendments are often made to development proposals following statutory consultation. These amendments could impact upon viability assumptions, so restricting submission of a viability assessment to validation stage could prove premature and is unnecessarily onerous</p> <p>The following amendment is suggested for part 7</p> <p>Development proposals that seek to depart from policy on viability grounds must be supported by a viability assessment at validation stage that is suitable, proportionate, and transparent and accords with the required Council's methodology. Assessments should consider alternative funding mechanisms to aid scheme viability.</p> <p>Part 8 of the policy should also be deleted to reflect the proposed change to Part 7, as it is no longer required</p>	<p>Comments noted. The Council does not consider it necessary to amend the policy or table 4 as requested. The list is not exhaustive and does not prevent a case being made on an appropriate application. In line with the NPPF planning obligations will only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. NPPF para 57.</p> <p>The Council does not consider it necessary to amend part 7 of the policy as requested. The NPPF is clear in para 58 that ...”It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage...” and that planning applications that comply with up to date policies should be assumed to be viable. Therefore where there is a departure from policy on viability grounds the application should include the required viability assessment from the outset.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS433	Mr Jake Lambert Bidwells / Hopkins Homes	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	To better reflect the process of development management, Hopkins Homes wish to suggest the deletion of Part 4 of the policy ,and the following amendment to Part 7 of the policy:	Comments noted. The regulation 19 Local Plan , policy HC4 bullet 7 states: <i>Development proposals that seek to depart from policy on viability grounds must be supported by a viability assessment at validation stage that is suitable, proportionate, and transparent and accords with the required Council's methodology. Assessments should consider alternative funding mechanisms to aid scheme viability</i>	No	N/A
LPS462	Mr Jake Lambert (Bidwells, Broadland Housing Association)		Development proposals that seek to depart from policy on viability grounds must be supported by a viability assessment. at validation stage once responses from all statutory consultees have been received. The assessment must be that				

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				<p><i>is-suitable, proportionate, and transparent and accords with the required Council's methodology. Assessments should consider alternative funding mechanisms to aid scheme viability</i></p> <p>Part 8 of the policy should also be deleted to reflect the proposed change to part 7 (LPS462)</p>	<p>The Council does not consider it necessary to amend the policy or table 4 as requested. The list is not exhaustive and does not prevent a case being made on an appropriate application. In line with the NPPF planning obligations will only be sought where necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development. NPPF para 57</p> <p>The Council does not consider it necessary to amend part 7 of the policy as requested. The NPPF is clear in para 58 that ..."It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage..." and that planning applications that comply with up to date policies should be assumed to be viable. Therefore where there is a departure from policy on viability grounds the application should include the required viability assessment from the outset.</p> <p>Conclusion No Change proposed</p>		
LPS130 LPS207	Mrs Gemma Harrison (Holt Town Council) (Cley parish Council)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	The delivery of adequate additional infrastructure should precede the development not align with. Amend Point 6 re viability to, 'proposals which don't have a viability assessment will not be assumed to be fully policy compliant'	<p>The Council does not consider it necessary to amend the policy as requested. Criteria 6 and 7 are clear and are in line with para 58 of the NPPF planning applications that comply with up to date policies should be assumed to be viable.</p> <p>Proposals that seek a departure on viability grounds need to be accompanied by a viability assessment. For reasons of clarity a modification is proposed in relation to criteria 6 / rep LPS608 below</p> <p>Conclusion No Change proposed</p>		
LPS608	Ms Kerry Harris (Thornage parish Council)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	<p>While the Draft Local Plan has a specific policy (HC4), which is to be welcomed, the wording of criterion HC4(6) is unclear and open to misinterpretation In the interests of effectiveness that needs to be corrected to reflect Para. 5.4.14:</p> <p>(6) Proposals that are accompanied by a viability assessment(3) will not be taken as fully policy compliant do not need to be accompanied by a viability assessment(3)</p>	<p>The regulation 19 Local Plan , policy HC4 bullet 6 states: <i>Proposals that are not accompanied by a viability assessment (3) will be taken as fully policy compliant.</i> This clarifies that proposals which do not submit a viability assessment will be assumed to be fully policy compliant. In line with NPPF Para 58 which states that <i>Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable....</i></p> <p>For clarity a modification is proposed to clarify that were proposals are considered to be policy compliant they do not need to be accompanied by a viability assessment</p> <p>Conclusion Agree to requested modification (part)</p>	yes	PMIN/HC4/02
LPS766	Mr Mark Behrendt (House Builders Federation)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	<p>The plan is unsound as the cumulative impact of the policies on the viability of development has not been robustly tested.</p> <p>The Council must include the following costs as part of its viability assessment :</p> <ul style="list-style-type: none"> • Biodiversity net gain • Energy efficient standards (policy CC3) • Electric Vehicle Charging 	<p>Comments noted. Such costs and allowances are reflected in the updated viability study. The future price paid for land should also reflect such national policy considerations.</p> <p>Conclusion No Change proposed</p>	No	N/A

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LPS307	Mr Sam Hazell (Lawson Planning Partnership Ltd, white lodge (Norwich) Ltd)	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	In order to make the Plan sound, a separate updated viability assessment which is proportionate and necessary should be undertaken to examine the policy interaction on small sites in Small Growth Villages, to ensure the Plan is justified and effective in meeting the identified housing need, including affordable need, on a District Level, as set out in detail in the representations letter dated 1st March 2022, attached.	The Local Plan is supported by an up to date and proportional viability study. The representation is in relation to the supporting evidence. No specific modification have been suggested and No modifications are required. Conclusion No Change proposed	No	N/A
PC029	North Norfolk District Council	5.4 Infrastructure Provision, Developer Contributions & Viability	Policy HC4	Policy HC 4 Criterion 4 (h Uses 'European Sites' and 'Natura 2000 sites' and 'sensitive sites' in the same sentence and refers to the emerging mitigating strategy which is now in place Suggest remove ref to Natura 200s sites and update sentence to refer to the GIRAMS.	Modifications is proposed for reasons of clarity Remove reference to pressure on Natura 2000 sites and update to directly refer to the GIRAMS Conclusion Agree to requested modification	Yes	PMIN/HC4/01
PC030	North Norfolk District Council	5.5 Fibre to the Premises (FTTP)	5.5.3 Policy HC5, Criterion (b)	Phrasing Issue evidence that an agreement to connect to the development site to the fibre broadband network has been secured, and details are provided on how the physical infrastructure onsite is capable of supporting gigabit-capable networks;	Modification is proposed for reasons of clarity Conclusion Agree to requested modification	Yes	PMIN/5.5/01
LPS769	Mr Mark Behrendt (Home Builders Federation)	5.5 Fibre to the Premises (FTTP)	Policy HC5	Given the Government's clear intention with regard to such infrastructure we would suggest that this policy is not needed and should be deleted to avoid confusion as to the relevant standard to be applied. The viability assessment will also need to take account of the cost of meeting these requirements up to the cost cap being proposed in the consultation.	NPPF Paragraph 34 states that Plans should include setting out the levels and types of affordable housing provision required along with other infrastructure (such as that needed for education, health, transport, flood and water management , green and digital infrastructure). High Quality digital Infrastructure is of major strategic significance for Norfolk and crucial to the success of the District and the policy is a commitment through the Duty to co-operate – Agreement 24. Building regulations require new buildings to have physical infrastructure to support high-speed broadband (greater than 30Mbps). However, there is no requirement to provide external or site-wide infrastructure beyond the access point. There is a commitment from BT Open reach to install Fibre to premises free of charge to all new housing development of 20 or more homes and improved pricing structure all the way down to two homes. More information can be found in the Norfolk Strategic Planning Framework Duty to co-operate Statement of Common Ground Conclusion No Change proposed	No	N/A
LPS87	Dr Victoria Holliday	5.6 Telecommunications Infrastructure	Policy HC6	There should be provision here to control telecommunication infrastructure in the AONB, other protected habitats and landscapes where rurality and tranquillity is important, and in conservation areas. Planning permission may be granted for new telecommunications infrastructure provided... Proposed change :	The Council does not consider it necessary to amend the policy as requested. Whilst it is agreed that the highest degree of protection will be given to the designated landscapes it must also be recognised that a high proportion of the District and many smaller settlements fall under the AONB. The defined special qualities of the AONB and the Broad's are recognised specifically through Policy ENV1 and relevant decisions will be made with reference to	No	N/A

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				d. it is not being sited in the AONB, a protected landscape or a conservation area, in which case the application should go through the standard application process.	the Development Plan as a whole. The local Plan cannot determine whether planning consent is required Conclusion No Change proposed		
LPS340	Miss Natalie Beal (Broads Authority)	5.6 Telecommunications Infrastructure	Policy HC6	Does not refer to the impact of telecommunications infrastructure on the setting of the Broads (and AONB?). This could be weaved into part b. Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF Paragraph 176. Proposed change 'it has been demonstrated that the least visually intrusive option has been selected, including the use of innovative design and construction and/or sympathetic camouflaging and landscaping, which does not impact on the Broads or its setting; and'	The Council does not consider it necessary to amend the policy as requested. Whilst it is agreed that the highest degree of protection will be given to the designated landscapes it must also be recognised that a high proportion of the District and many smaller settlements fall under the AONB. The defined special qualities of the AONB and the Broad's are recognised specifically through Policy ENV1 and relevant decisions will be made with reference to the Development Plan as a whole. Conclusion No Change proposed	No	N/A
LPS678	Ms Laura Joyce (Natural England)	5.6 Telecommunications Infrastructure	Policy HC6	Natural England agrees that telecommunications infrastructure should avoid visual impacts to the Norfolk Coast AONB. In line with Policies ENV1 and ENV4, we recommend that an appropriate assessment and/or project level HRA is undertaken to assess potential impacts and ensure no likely significant effect to protected landscapes or designated sites.	Support noted. The Council does not consider it necessary to amend the policy as requested. The Regulation 19 Plan has been subject to Habitat Regulation Assessment. Natural England through LPS762 conform their agreement with the conclusions and that Natural England is satisfied that the Habitats Regulations Assessment (HRA) (Footprint Ecology, 9th December 2021) has provided a robust Explanation assessment of the Regulation 19 stage of North Norfolk District Councils Draft Local Plan in accordance with the requirements of the Conservation of Habitats and Species Regulations 2017 (as amended) and having regard to relevant case law. The plan wide HRA screens out likely significant effects for this policy. The requirement for consideration of the potential for adverse impacts on the local landscape character are already included in Policy ENV1 and 2. There is no need to consider any proposals will be assessed against the Local Plan and development framework as a whole Conclusion No Change proposed	No	N/A
LPS24	Mr David Hurdle	5.7 Parking Provision	5.7.1 5.7.2	This paragraphs should stress the need to REDUCE car use, indeed MINIMISE it. Moving to alternative fuels is fine but traffic levels HAVE to be less.	Comment noted. The Council does not consider it necessary to amend the paragraphs as requested. Section 5.7 relates to parking provision. As such, Para. 5.7.1 clearly states the national policy objective of restricting vehicle parking associated with new development in order to REDUCE the use of the private car. This is considered appropriate and justified for the matter of parking provision. Para. 5.7.2 acknowledges the practical difficulties of the District, particularly in relation to the rural nature of a large proportion of the district and the limited availability of public transport. Policy CC9 reflects the Council's strategic approach to transport and states 'Development will be well located and designed to minimise the need to travel and maximise the use of sustainable forms of transport appropriate to its particular location.' Conclusion No change proposed.	No	N/A

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LPS24	Mr David Hurdle	5.7 Parking Provision	5.7.1 5.7.2	These paragraphs should stress the need to REDUCE car use, indeed MINIMISE it. Moving to alternative fuels is fine but traffic levels HAVE to be less.	<p>Comment noted. The Council does not consider it necessary to amend Paras. 5.7.1 and 5.7.2 as requested.</p> <p>Para. 5.7.1 clearly sets out the national objective to restrict levels of parking associated with new development in order to reduce the use of the private car and to promote more sustainable forms of transport. Para. 5.7.2 sets out the district context in relation to national data, and comments on the rural nature of much of the district and the limited availability of public transport. The Council's settlement hierarchy in Policy SS1, sets out the distribution of development where the majority of growth is proposed in the most sustainable settlements of the district, within the top two tiers of the hierarchy (Large and Small Growth Towns). As such, the plans overall objectives for sustainable growth, which aims to reduce the reliance on the private car.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS643	Mr Lyndon Swift (Weybourne Parish Council)	5.7 Parking Provision	Policy HC7	The Plan needs to address the issue of increased parking pressures throughout the region (e.g. in town centres and tourist areas), not just at the location of each new development.	<p>Comment noted. No specific modification to Policy HC7 is proposed. The Council does not consider it necessary to amend Policy HC7 as requested.</p> <p>It is recognised that there is potential for conflict between tourist parking and residential parking during peak periods. Policy HC7 sets out parking requirements for new development. An objective of the plan is to improve connectivity and access to green infrastructure and open spaces and to encourage greater use of public transport.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS770	Mr Mark Behrendt (Home Builders Federation)	5.7 Parking Provision	Policy HC7 Part 2, Criterion 1	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <p>Requirements for electric vehicle charging are inconsistent with national policy.</p> <p>As outlined in our comments on policy CC8 it is not necessary for the Council to refer to electric vehicle charging as these have now been set out in building regulations. Therefore, the reference to electric vehicle charging should be deleted from this policy.</p>	<p>Comment noted. The Council does not consider it necessary to amend Policy HC7, part 2, criterion1 as requested.</p> <p>In Policy CC8, the Council has provided Electric Vehicle Charging requirements in accordance with national planning policy and guidance and in particular, NPPF para. 112.e) and 107.e). The level of ECV charging is not described in detail for all types of development within the Building Regulation Part S Document, nor in the County Council's Parking Guidelines for new developments in Norfolk (July 2022). The Policy provides more certainty to different planning uses and will also cover circumstances which would not fall under Building Regulations. This Policy is linked to Policy HC7, given the requirements relate to proposals where vehicle parking is incorporated.</p> <p>Conclusion No change proposed.</p>	No	N/A
PC110	North Norfolk District Council	5.7 Parking Provision	Policy HC7 & Footnote 1	The Norfolk County Council parking standards document has been renamed as Parking Guidelines for new developments in Norfolk and revised in July 2022. Therefore, the policy wording and footnote/ link require updating.	<p>Comment noted, modifications agreed to update wording and footnote of Policy HC7 accordingly to add clarity. Policy HC7, Point 2: ...Norfolk County Council Parking Guidelines.. Renumbering second part of policy from 1. To 5 and 2. To 6. Removing plural reference to Policies Maps to Policies Map. Footnote 1. Updated name Parking Guidelines for new developments in Norfolk and revised in July 2022.</p>	Yes	PMIN/ HC7/01

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				Also numbering of second part of policy needs amending to be consistent with other policies – numbering 5 and 6 and remove plural of Policies Maps, as this is singular.	Conclusion Agree to requested modification.		
LPS70	Dr Victoria Holliday	5.7 Parking Provision	Policy HC7 Criterion 2	Change to 'Development proposals set NCC standard of parking provision as a minimum'.	Comment noted. The Council does not consider it necessary or justified to amend Policy HC7, Criterion 2 as requested. Criterion 2 allows the necessary flexibility to customise the level of car and cycle parking to the particular needs and location of a proposal, using the Norfolk County Council parking standards as its starting point. This is considered to align with the national guidance (NPPF para. 110 c), including the National Design Guide and National Model Design Code. Conclusion No change proposed.	No	N/A
LPS770	Mr Mark Behrendt (Home Builders Federation)	5.7 Parking Provision	Policy HC7 Criterion 2	The policy is not sound as it not consistent with national policy. Part 2 [Criterion 2, Part 1] of this policy must be rewritten as it is currently inconsistent with national policy. The policy cannot state that development proposals must accord with supplementary guidance as this can be changed without the need for the level of scrutiny required to amend a local plan policy. Whilst we recognise that the policy goes on to state that this is only a starting point, we would suggest that greater clarity is required to make the policy sound. We would suggest the following wording: "Development proposals make provision for vehicle and cycle parking having regard to the latest Norfolk County Council Parking Standards. When deciding on the level of parking provided consideration will also be given to local conditions, such as the availability of public parking, sustainable travel modes and design and conservation objectives."	Comment noted. The Council does not consider it necessary to amend Policy HC7, Criterion 2 as requested. The criterion is considered to be consistent with national policy (see NPPF para. 107). The Norfolk County Council Parking Standards, which is consulted upon, provides a consistent set of parking guidelines for application within new development throughout Norfolk and as such, it is considered that the document provides a legitimate basis for the Council's parking policy. Conclusion No change proposed.	No	N/A
LPS192	Andrea Long, Compasspoint Planning and Rural Consultants (Wells Town Council)	5.8 Safeguarding Land for Sustainable Transport	Policy HC8 Criterion 1 Policy HC8 Criterion 2	The list in the policy omits an important trackbed. An addition is requested as follows: "e) Walsingham to Wells-next-the-Sea" The second part of Policy HC8 refers to Areas designated as Land Safeguarded for Sustainable Transport which are currently in use as, or with potential for, rail freight facilities in the following settlements will also be protected from development:.....b) Fakenham c) Great Ryburgh." . An addition is requested as follows: e) Wells-next-the-Sea The reasons for the requested amendment are as follows:	Comment noted. The Council does not consider it justified to amend Policy HC8 as requested. The list of land within North Norfolk to be safeguarded for sustainable transport is produced in collaboration with Norfolk County Council. The trackbed has not been identified strategically by Norfolk County Council as a site that requires safeguarding for potential rail freight operations in the future. The delivery of this has not been evidenced. Conclusion No change proposed.	No	N/A

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				<p>a) National government policy requires local authorities to identify and protect sites and routes [which are] critical in developing infrastructure...allowing road to rail transfer (5.8.3).</p> <p>b) Tremendous growth in tourism in recent years has put great pressure on parking and roads in holiday resorts, with the railway playing a crucial role in Park and Ride services in coastal settlements like St Ives, Newquay, and Looe, in Cornwall, for example.</p> <p>c) The 23 miles of track or track bed from Wymondham to Fakenham is already in use or protected. The Mid Norfolk Railway has a long term, published ambition to restore the railway to Fakenham. The track bed from Fakenham to Walsingham is already protected under criterion d) of Local Plan Policy HC8. The track bed from Walsingham to Wells-next-the-Sea is intact. To secure the benefits of a through rail park and ride service, the track bed into Wells needs to be protected too.</p>			
LPS644	Mr Lyndon Swift (Weybourne Parish Council)	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	6.1	<p><i>6.1.4 Although the AONB is recognised as a sensitive landscape, development should not be prevented purely on the basis of its designation. Any development proposals within or affecting its setting will have to demonstrate clearly that they are appropriate to the landscape character type and designation. Sites that are suitable for housing outside Local Plan allocations should be developed specifically to meet local affordable and other locally identified housing needs. Proposed Submission Version (Regulation 19 Publication) Local Plan 87 Environment 6 This is not limited to only affordable housing provision but also to ensure wider local needs are met and a wide range of people are able to continue to work and live in the AONB. To do otherwise would fail to address these needs, which could then only be met by releasing more sensitive sites, causing harm and compromising the primary purpose of the AONB designation. This does not meet the "Effective" or "Justified" tests of soundness. The housing to be built in Weybourne, and in a number of other small and large growth villages is be to meet demand for retired people moving into the area, according to NNDC's Planning Policy Manager. There will be no protection to ensure that properties do not become second homes. THIS DOESN'T MEET LOCAL NEED.</i></p> <p>The Plan needs to specify that development within the AONB is to meet LOCAL NEED. There therefore needs to be a mechanism for ensuring that housing is suitable for and genuinely affordable to local families and young people, who will be those who support the growth in the number of elderly people within the District.</p>	<p>The Council does not consider it necessary to amend the policy as requested. Part of the comment does not relate to the policy proposed and largely reiterate points raised elsewhere in relation to housing. Whilst it is agreed that the highest degree of protection will be given to the designated landscapes it must also be recognised that development proposals will have to contribute positively and conserve and enhance the valued landscape and its setting. The defined special qualities of the AONB and the Broad's are recognised specifically through Policy ENV1.</p> <p>No specific modification have been suggested. No modifications are required.</p> <p>Conclusion No Change proposed</p>	No	N/A
PC036	North Norfolk District Council	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	6.1.1	Change cultural to culture	<p>Modifications is proposed for reasons of clarity</p> <p>Conclusion</p>	Yes	PMIN/6.1/01

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					Agree to requested modification		
PC037	North Norfolk District Council	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	6.1.1 Policy ENV1	Clarification - the term 'major development' in this instance is not the number of unit or area of land definition, but reflects para 177	Comments noted. This is detailed in para 6.1.6. Further clarification could be brought that this is in line with Paragraph 177 of the NPPF to the section and the policy. Conclusion Agree to requested modification	Yes	PMIN/6.1/02 PMIN/ENV1/01
LPS88	Dr Victoria Holliday	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Policy ENV1	Point 2 ' development proposals should contribute positively and conserve and enhance these valued landscapes...' gives insufficient protection. The tranquillity and remoteness of the Norfolk Coast AONB is gradually being eroded by development which does not conserve, protect or enhance any of the qualities of this special landscape. This can be seen along the coast and at night with the recession of the dark skies. Proposed change Point 2 - Development proposals must contribute positively and conserve and enhance...	The Council does not consider it necessary to amend the policy as requested. The NPPF requires that great weight <u>should</u> be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues (paragraph 176). Bullet point 4 goes on to define the requirement by stipulating proposals <u>must</u> demonstrate how they protect and enhance the listed 7 separate criteria. The approach is supported and welcomed by the AONB partnership and Natural England (LPS131, LPS680) Conclusion No Change proposed	No	N/A
LPS131	Mrs Gemma Harrison	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Policy ENV1	'Development will not be allowed unless' rather than 'Development will be allowed if'	The Council does not consider it necessary to amend the policy as requested. Such a modification would not be positively prepared in line with NPPF requirements Conclusion No Change proposed	No	N/A
LPS272	Ms Gemma Clark (Norfolk Coast Partnership)	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Policy ENV1	The Norfolk Coast Partnership is supportive of the stronger policy stance for the protection and enhancement of the Norfolk Coast AONB. Especially the acknowledgement of its special qualities and nocturnal character, which has been of greater concern in recent years. Also the reference to siting, scale massing and design is an important element of the policy when considering the impact of large replacement homes and new development on the special qualities of the AONB. We are also supportive of the acknowledgement of the AONB through policies EN2, E6 and E7 and are supportive that new touring and camping sites will continue to not be permitted in the AONB. The Management Plan is under review therefore any references to it via website links will need to be checked (footnote 72). Once reviewed it will be easily located via the Norfolk Coast Partnership home page.	Comments noted. No specific modification have been suggested. No modifications are required. Conclusion No Change proposed	No	N/A
LPS680	Ms Laura Joyce (Natural England)			We support a policy specific to the Norfolk Coast AONB and The Broads National Park. We agree that particular attention should be given to the objectives and principles set out in the Norfolk Coast AONB Management Plan 2014-2019 and the Broads Plan 2017 and any successor documents. (LPS680)			

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LPS725	Ms Debbie Mack (Historic England)			<p>Natural England also agrees that development proposals should provide a Landscape and Visual Impact Assessment where potential adverse impacts area considered likely. Consideration should also be given to development proposals outside of the AONB and National Park boundaries to avoid further significant impacts on the protected landscape, as set out in paragraph 176 of the NPPF.</p> <p>We welcome the reference to Conservation Areas and Registered Parks and Gardens in this policy(LPS725)</p>			
LPS341	Miss Natalie Beal	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Policy ENV1	<p>Comment Needs to refer to the dark skies of the AONB and the Broads. ENV1 para 4 part c refers to tranquillity, but given the darkness of the skies of the AONB and Broads that is referred to in the Local Plan, dark skies needs to be mentioned specifically. I see reference to ‘nocturnal character’, but I am not really sure what that term means; I don’t see it explained anywhere – as mentioned, dark skies is talked about. If that is meant to refer to dark skies or addressing light pollution, then either say that or explain what nocturnal character means.</p> <p>Policy ENV 1b – should perhaps say ‘built and geological features’, as I take the term ‘cultural heritage’ to include historic structures</p> <p>Relevant part of NPPF Intrinsically dark skies is at para 185 C of the NPPF.</p> <p>Proposed change Either explain what nocturnal character is or be specific and talk about dark skies and light pollution.</p> <p>Policy ENV 1b – should perhaps say ‘built and geological features’, as I take the term ‘cultural heritage’ to include historic structures.</p>	<p>The Council does not consider it necessary to amend the policy as requested. In line with the policy, proposals must demonstrate how they reinforce the local distinctness and local character as defined by the 2021 North Norfolk Landscape Character Appraisal, LCA, which is adopted as a Supplementary Planning Document, SPD. It’s recognised that dark skies can make an important contribution to people’s perception and enjoyment of the landscape but that they can also farm part of the characteristics of some of the identified landscape character types. Where relevant dark skies are identified in the LCA and form part of the valued features of the identified landscape characters. The impacts and opportunities to address vary in relation to the forces for change, vision and the individual Landscape strategies and guidelines for each landscape type detailed in the LCA. .</p> <p>In addition Policy CC13 Protecting Environmental Quality specifically addresses light pollution in bullet 1(e). Bullet 3 requires proposals specifically to minimise the impact on tranquillity and dark skies across all of North Norfolk and adjoining authorities’ areas which includes the Broads.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS490	Mr Mark Singer (Sutherland Homes/ Barton Willmore)	6.1 Norfolk Coast Area of Outstanding Natural Beauty & The Broads	Policy ENV1	<p>We acknowledge the site’s location in the Area of Outstanding Natural Beauty. (<i>site allocation C16</i>). We consider that exceptional circumstances for development exist by virtue of the site being located within the settlement boundary, it being not intrusive in the wider landscape, and the need for the development to contribute to the District’s housing growth needs in the plan period. The need for elderly persons accommodation is a crucial part of this. We note Paragraph 7.2.8 states North Norfolk has one of the highest over-65 populations as a proportion of its total population in the country.</p> <p>Whilst we recognise a planning application is not being submitted at this stage, Paragraph 177 in the National Planning Policy Framework (NPPF) (July 2021) sets out the considerations that will be taken into account when considering applications for development within National Parks, the Broads, and Areas of Outstanding Natural Beauty. It sets out:</p>	<p>The Council does not consider it necessary to amend the policy as requested. The comment in the main does not relate to the policy proposed and largely reiterate points raised elsewhere in relation the promotion of site C16. The suggested scale and location of development in Cromer has sought to balance the need for growth whilst protecting the setting and the special qualities of the Norfolk Coast Area of Outstanding Natural Beauty. Further detail is contained in the site assessment Booklet for Cromer.</p> <p>Conclusion No Change proposed</p>	No	N/A

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				<p>“Considerations of such applications should include an assessment of:</p> <p>a) The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</p> <p>b) The cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and</p> <p>c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated”.</p> <p>Paragraph 10.0.2 in the draft Plan sets out that Cromer has significant landscape constraints, limiting its potential to accommodate large scale growth. There are limited options to meet growth requirements, and when coupled with the need for elderly care accommodation and new residential development (including affordable housing) warrants the inclusion of the site despite it being in the Area of Outstanding Natural Beauty.</p> <p>As set out above, we will seek to deal with the assessment through a design-led approach which we look forward to discussing with the Council as part of the pre-application process and the application itself.</p> <p>For clarity however, the policy should be amended to ensure there is no conflict between Policy ENV1 and allocation policies such as C16.</p> <p>Proposed change “With the exception of allocated sites, proposals for major development will be refused, unless exceptional circumstances exist and it can be demonstrated that the proposal is in the public interest.”</p>			
LPS320	Mr David Spray (Marine Management Organisation)	6.2 Protection & Enhancement of Landscape & Settlement Character	6.2	There is policy overlap between ENV2 and particularly ENV3 with regard to East Marine Plan Policy E – SOC3. Policies/Marine Plans could be signposted to in a similar way to SMPs (6.4.12).	No specific modification have been suggested. No modifications are required. Conclusion No Change proposed	No	N/A
LPS89 LPS132	Dr Victoria Holliday Ms Gemma Harrison (Holt Town Council)	6.2 Protection & Enhancement of Landscape & Settlement Character	Policy ENV2	<p>Points 1 and 3 - 'development should' gives insufficient protection and 'development must' would be preferable. Should is too subjective.</p> <p>Holt Town Council asked for a change of wording for Point 3, Development proposals 'must' not 'should' protect, conserve and enhance the landscape.</p>	<p>The council places great weight through the Plan on ensuring development reflects the defining and distinctive qualities of the varied landscapes character areas. The suggested modification(s) along with a similar modification to criteria 4 would strengthen the policy and align with the aims of the Plan and specific policy ambitions</p> <p>Conclusion Agree to requested modification(s)</p>	Yes	PMIN/ENV2/01
LPS405	Sarah Hornbrook, Bidwells (Flagship Housing Group, ESCO Developments & Lovell Partnerships)	6.2 Protection & Enhancement of Landscape & Settlement Character	Policy ENV2	Part 2 of the draft policy notes that consideration will be given to both the individual and cumulative impacts of a proposal. The policy as written does not define how cumulative impacts may be considered in decision-making. Moreover, given the case-by-case nature of landscape impacts, the policy requirement to cumulatively assess	The Council does not consider it necessary to amend the policy as requested. The approach is in line with the NPPF and the Planning Practice Guidance which states that planning policies should ensure that new development takes into account the likely effects of the natural environment, including cumulative landscape and visual impacts (para 155a, 185), PPG Natural Environment	No	N/A

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LPS438 LPS465 LPS479	Mr Jake Lambert, Bidwells (Hopkins Homes) Mr Jake Lambert, Bidwells (Broadland Housing Association) Mr Jake Lambert, Bidwells (Crisp Malting Group)			<p>every development proposal in terms of landscape impacts is unlikely to apply in every case. This questions the effectiveness of this element of the draft policy, risking non-compliance with Paragraph 35(b) and (c) of the NPPF.</p> <p>Proposed change Suggested revisions to the wording of part 2 of the policy are set out below. Proposed additional wording is shown in <i>italics</i>, and suggested omissions are shown struckthrough.</p> <p><i>Outside of designated landscapes the Council will support development which is in scale and keeping with the defined landscape character and which is appropriate to its surroundings in terms of siting, design, materials, external appearance and landscaping. Consideration will be given to both the individual and cumulative impacts of a proposal.</i></p>	<p>paragraph: 036 Reference ID: 8-036-20190721. Revision Date 21.7.2019.</p> <p>Conclusion No Change proposed</p>		
LPS681	Ms Laura Joyce (Natural England)	6.2 Protection & Enhancement of Landscape & Settlement Character	Policy ENV2	<p>We welcome the commitment to enhance connectivity to surrounding green infrastructure and Public Rights of Way networks. We suggest that enhancement also facilitates wildlife through management of footpath edges/verges to increase biodiversity where possible.</p>	<p>Comments noted. No specific modification is requested or required</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS342	Miss Natalie Beal (Broads Authority)	6.2 Protection & Enhancement of Landscape & Settlement Character	Policy ENV2	<p>Comment on ENV2 Paragraph 6.2.6 refers to dark skies which is supported, but there does not seem to be a mention in the policy itself – policy ENV2. I see reference to ‘nocturnal character’, but I am not really sure what that term means; I don’t see it explained anywhere – as mentioned, dark skies is talked about. If that is meant to refer to dark skies or addressing light pollution, then either say that or explain what nocturnal character means.</p> <p>Relevant part of NPPF Intrinsically dark skies is at para 185 C of the NPPF.</p> <p>Comment on Figure 8 Needs to reference the BA Landscape Character Assessment – perhaps as a footnote?</p> <p>Relevant part of NPPF The Broads and the setting of the Broads is protected at NPPF paragraph 176.</p> <p>Proposed change to ENV2 Either explain what nocturnal character is or be specific and talk about dark skies and light pollution.</p> <p>Proposed change to Figure 8 Add a footnote to the part of the key that says ‘Broads Authority Executive Area’ that says something like ‘There is a Landscape Character Assessment for the Broads which can be found here: Landscape Character Assessment (broads-authority.gov.uk)’</p>	<p>The Council does not consider it necessary to amend the policy as requested. In line with the policy, and proposed modification (PMIN/ENV2/01) proposals in the North Norfolk outside the Broads Local Planning Authority Area must be informed by the key characteristics and valued features of the distinctive landscape types as identified in the Landscape Character Appraisal SPD and, Landscape Sensitivity Assessment SPD and relevant conservation Area Appraisals. It’s recognised that dark skies can make an important contribution to people’s perception and enjoyment of the landscape but that they can also farm part of the characteristics of some of the identified landscape character types. Where relevant dark skies are identified in the LCA and form part of the valued features of the identified landscape characters. The impacts and opportunities to address vary in relation to the forces for change, vision and the individual Landscape strategies and guidelines for each landscape type detailed in the LCA.</p> <p>In addition Policy CC13 Protecting Environmental Quality specifically addresses light pollution in bullet 1(e). Bullet 3 requires proposals specifically to minimise the impact on tranquillity and dark skies across all of North Norfolk and adjoining authorities’ areas which includes the Broads.</p> <p>The setting of the Broad’s is included in the Policy ENV1 which is specific in its purpose to ensure that the statutory duty and appropriate high level of protection is given to designated landscapes such as the Broads.</p> <p>Conclusion No Change proposed</p>	No	N/A
PC040	North Norfolk District Council	6.3 Heritage & Undeveloped Coast	Policy ENV3	<p>Confused by this. I presume this means located elsewhere rather than replacement where it is?</p> <p>Undeveloped Coast - as written this policy causes confusion as it conflicts with multiple policies in the Plan (particularly</p>	<p>Agree modifications to Para. 6.3.1 and Policy ENV3, Criterion 1 to explain the Policy in the context of Policy SS1, given there are a number of Selected Settlements that are situated within the Undeveloped Coast and Heritage Coast.</p> <p>Conclusion</p>	Yes	PMIN/ENV3/01

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				<p>Policy SS1) which do allow for development in locations within the coastal zone.</p> <p>For example, a number of Small Growth Villages with housing targets (Bacton, East Runton, West Runton, Overstrand, Happisburgh) are wholly within the Undeveloped Coast. If taken literally, the Undeveloped Coast policy concludes that no development is acceptable in the above growth villages. Clearly this is in conflict with our own strategy and needs to be made clear to avoid confusion when determining applications.</p>	Agree to requested modification.		
LPS504	Mr Mike Jones (Norfolk Wildlife Trust)	6.4 Biodiversity & Geodiversity	6.4.10 Policy ENV4	<p>In order to ensure that the policy is effective, we recommend modifications to the wording to ensure that it is clear that impacts can occur offsite as well as onsite, and to ensure that the wording is clear about the mitigation hierarchy in all circumstances. We recommend the following modifications to make this policy effective.</p> <p>Section 6.4.10 should also include reference to 'County Wildlife Sites'.</p> <p>Section 2a should include 'either onsite or nearby' to raise awareness that indirect impacts can occur on adjacent land, with a resultant need for ecological assessment, even if there are relevant features known on site.</p> <p>Section 6 needs to include reference to the need for compensation for any impacts referred to here. The need to compensate for impacts, as set out in section 3 of the policy, still applies where relevant legally in section 6 and so we recommend reference to compensation is also included here for clarity.</p>	<p>Comments noted, part modification agreed to include County Wildlife Sites in Para. 6.4.10.</p> <p>We recognise the need for net gain and this is referenced in the supporting text (Para. 6.4.4) and policies elsewhere.</p> <p>Conclusion Agree to requested modification (part).</p>	Yes	PMIN/6.4/02
LPS226	Ms Sarah Mitchell (RSPB)	6.4 Biodiversity & Geodiversity	6.4.4	<p>Suggest amending penultimate sentence - 'In the long term, as our climate begins to change...' to 'In the long term, as our climate continues to change...'</p>	<p>Comment noted, modification agreed as requested.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/6.4/01
LPS645	Mr Lyndon Swift (Weybourne Parish Council)	6.4 Biodiversity & Geodiversity	Policy ENV4	<p>All rules on biodiversity/climate change and adaptation etc must apply to extensions as well as new developments.</p> <p>The plan does not take into account the impact of house-owners replacing existing permeable surfaces with hard landscaping. This needs to be brought into the planning system, or there will be an increase in surface run-off from existing properties that will contribute to localised flooding, undoing any positives from the restrictions imposed in the Local Plan on new housing development. Mitigation measures need to be required at a minimum. There should be limits to the proportion of the site area that can be covered in non-permeable landscaping.</p> <p>Property boundaries should be marked with hedges rather than walls and hard landscaping.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy ENV4 as proposed.</p> <p>The comment appears to be wide ranging, touching on biodiversity/ climate change and adaptation in relation to smaller scale householder extensions, many of which are permitted development. With regards to Policy ENV4, it is not intended to capture all development proposals, but development proposals that trigger the policy in relation to biodiversity and/or geodiversity.</p> <p>Conclusion No change proposed.</p>	No	N/A

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PC042	North Norfolk District Council	6.4 Biodiversity & Geodiversity	Policy ENV4 Criterion 3-6	Criterion 4 forms part of criterion 3 and as such, the numbering for criterion 4 should be removed and the following criterion renumbered to take account of this.	Agree to modification, to add clarity to Policy ENV4. Conclusion Agree to requested modification.	Yes	PMIN/ENV4/02
LPS91	Dr Victoria Holliday	6.4 Biodiversity & Geodiversity	Policy ENV4 Criterion 1	In order to be effective and to address concerns that pPoint1, as currently worded, could lead to targeted development proposals which are inappropriate apart from a seeming biodiversity gain, the policy wording should be changed to state that proposals will be supported in principle where there is an incidental increase in biodiversity. Please clarify if 'development' in this policy means all development, i.e. including extensions, replacement and subdivisions of buildings?	Comments noted, modification agreed to Criterion 2 to remove 'all' at beginning of sentence. It is not the intention of the Policy to capture all development proposals, but development proposals that are considered to trigger the policy in relation to biodiversity and/or geodiversity. The Council does not consider it necessary to amends point 1 of Policy ENV4 as proposed. Point 1 is clear in its purpose for development proposals where the principal aim is to conserve or enhance biodiversity or geodiversity. The scenario stated would therefore not apply in relation to 'incidental' net gain. Conclusion Agree to requested modification (part).	Yes	PMIN/ENV4/01
LPS406 LPS439 LPS480	Sarah Hornbrook, Bidwells LLP (ESCO Developments, Flagship Housing Group & Lovell Partnerships) Mr Jake Lambert, Bidwells LLP (Hopkins Homes, Broadland Housing Association, Crisp Malting Group)	6.4 Biodiversity & Geodiversity	Policy ENV4 Criterion 2(b)	In order to be effective, part 2b of this policy should be amended to reflect that some ecological and geological features require removal to facilitate development proposals, such as breaks in hedgerow to deliver a suitable access into a site. Without this caveat, the policy risks restricting the necessary enabling works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF. Suggests the following minor amendment to part b of the policy as follows. Proposed additional wording is shown in italics, and suggested omissions are shown struckthrough. 'Retain and buffer ecological and geological features wherever practical and feasible and provide for the appropriate management of those features'	Comments noted. The Council does not consider it necessary to amend the wording to Policy ENV4 criterion 2b) as requested. Point is caveated at the beginning by stating that development proposals will be expected to...As such, the proposed alterations are not required in order for there to be flexibility within the policy for differing biodiversity or geodiversity circumstances. It is noted that the word 'protect' has been omitted from criterion 2b) in relation to the proposed amendment. Conclusion No change proposed.	No	N/A
LPS157	Mr Michael Rayner (CPRE Norfolk)	6.4 Biodiversity & Geodiversity	Policy ENV4, Criterion 1	Comment: LNRSs and an NRN would be long term and multi-partner projects. Some may require an ecological survey and/or a Habitat Regulations Assessment.	Comment noted. The Council does not consider it necessary to amend Policy ENV4 criterion 1. The detail of the national policy is still evolving in this area with the Environment Act itself not due to come into effect until 2023. As stated in Para. 3.10.11 the Council intends to produce further guidance through a Supplementary Planning Document. National guidance is still awaited, no specific modification has been suggested. Conclusion No change proposed.	No	N/A
LPS645	Mr Lyndon Swift (Weybourne Parish Council)	6.4 Biodiversity & Geodiversity	Policy ENV4, Criterion 1(a)	In order to be effective, part 2b of this policy should be amended to ensure that meadows, ponds, recently planted wooded areas, heathland etc receive similar protection as these are all important for biodiversity and for carbon storage.	The proposed modification refers to Criterion 2b). or potentially 1a). In each case, the Council does not consider it necessary to amend Criterion 2a) as requested. Both criterion mentioned are clear in their objectives regarding designated sites and the need for an ecological survey. More general impacts on biodiversity is adequately addressed at Criteria 3 and 4.	No	N/A

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					Conclusion No change proposed.		
LPS646	Mr Lyndon Swift (Weybourne Parish Council)	6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy	6.5	<p>6.5.2 Within North Norfolk, such sites include the North Norfolk Coast SAC/SPA, the Wash and North Norfolk Coast SAC and European Marine Site, Overstrand Cliffs SAC, Winterton Horsey Dunes SAC, the Norfolk Valley Fens SAC, the River Wensum SAC (one of the best examples of a chalk river in the country) and the Broads and Broadland SAC and SPA. This does not meet the “Effective” test of soundness.</p> <p>NCC is planning to put a road and viaduct through the Wensum SAC area, including the destruction of veteran trees which will affect a maternity roost of rare and protected Barbastelle bats. This will fly in the face of NNDC’s policy.</p> <p>Proposed change The Plan must include protection from building and infrastructure development for designated sites.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The comment does not relate to the strategic policy proposed which specifically address compliance with the conservation of Habitats and Species Regulation 2017 (as amended) and ensures that the required mitigation in relation to identified likely significant effects with regard to recreational pressures on designated European sites is provided. Policy ENV4: Biodiversity & Geodiversity already includes criteria in relation to development and likely significant effects on European sites</p> <p>There are no proposals in the Plan to build on designated sites. The Issues raised is in relation to Norfolk County Council and wider development outside North Norfolk.</p> <p>Conclusion No Change proposed</p>	No	N/A
PC043	North Norfolk District Council	6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy	6.5.1	<p>Clarification These Internationally designated sites include Special Protection Areas (SPAs), Special Areas of Conservation (SACs), European Marine Sites, and Ramsar sites (wetland sites designated to be of international importance under the Ramsar Convention) and a range of <i>candidate sites</i> (84).</p>	<p>Modifications is proposed for reasons of clarity</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIN/6.5/01
LPS647	Mr Lyndon Swift (Weybourne Parish Council)	6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy	Policy ENV5	<p><i>Policy ENV 5 - Impacts on International & European sites: Recreational Impact Avoidance & Mitigation Strategy Planning permission will be granted subject to demonstrating no adverse effect on the integrity of European sites from recreational disturbance when considered alone or in-combination. This does not meet the “Effective” test of soundness. We do not believe it is possible to demonstrate no adverse effect before a development is built.</i></p> <p>Proposed change The Plan needs to clarify how “no adverse impact” can be demonstrated. There should also be a way of confirming that no adverse impact has actually taken place once the development is completed, and of imposing the requirement to take remedial action if harm is demonstrated.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The Norfolk wide Green Infrastructure & Recreational Impact Avoidance & Mitigation Strategy includes the requirement for Project-level HRA Screening Reports for all qualifying development in accordance with advice from natural England and the GIRAMS.</p> <p>Conclusion No Change proposed</p>	No	
LPS684	Ms Laura Joyce (Natural England)	6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy	Policy ENV5	<p>Natural England welcomes the commitment to a strategic approach to mitigate recreational visitor impacts to European sites.</p> <p>Developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify recreational disturbance impacts and mitigation.</p> <p>We strongly advise the Local Planning Authority instigates a suitably proportionate interim payment per dwelling in the absence of an established strategy to ensure new residential development and any associated recreational disturbance impacts on European designated sites are compliant with the Habitats Regulations, to address cumulative and in-combination impacts arising.</p>	<p>Comments noted. Prior to the adoption of the Local Plan the Local Planning Authority implemented the GIRAMS from the 31 March 2022. Contributions from appropriate development are already being conditioned through S106 agreements and S111 payments</p> <p>Conclusion No Change proposed</p>	No	N/A

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LPS92	Dr Victoria Holliday	6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy	Policy ENV5	<p>Point 1 - how will a planning application demonstrate no adverse effect on a European site? What impact assessment is being used? Why aren't International sites referred to in the body of the policy.</p> <p>Proposed change Planning permission will be granted provided an independent assessment consistent with best practice demonstrates no adverse effect....</p>	<p>The Council does not consider it necessary to amend the policy as requested. Plans and projects are subject to Habitat Regulation Assessment, HRA. The findings of the HRA on the Local Plan have been used as an integral and iterative part of relevant policy formation. LSE have already been assessed and as such the policy secures the implementation of an agreed strategy.</p> <p>The policy ensures that County wide strategic mitigation measures which have been informed through the Green Infrastructure & Recreational Impact Avoidance & Mitigation Strategy and agreed through the Duty to co-operate Forum across Norfolk LPAs and with Natural England is delivered.</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS236	Ms Sarah Mitchell (RSPB)	6.5 Impacts on Internationally Designated Sites: Recreational Impact Avoidance & Mitigation Strategy	Policy ENV5	<p>Whilst internationally important designated sites are included in the Local Plan, and assessed in the HRA, we would also like to draw attention to two species whose presence within the District, but outside of designated sites may mean they are overlooked in planning. These are:</p> <p>European turtle dove North Norfolk (and north-west Norfolk) holds one of the last strongholds of European turtle dove in the UK, with key territories falling inside of the AONB. The turtle dove is one of the most threatened bird species in the UK. Its population fell by 95% between 1995 and 2018. Their range is increasingly concentrated into an ever-shrinking patch of East Anglia and the south-east of England. Globally, turtle doves are classed as Threatened (vulnerable) due to severe population decline (IUCN Red List of Endangered Species). Operation Turtle Dove (www.operationturtledove.org) works in the Local Plan area to save this species from UK extinction, but as the turtle dove is not a designated feature of the designated conservation sites in the area, and often, but not exclusively, found in farmland, its presence and sensitivity is often overlooked in planning. We would be happy to discuss the work of Operation Turtle Dove with the Council, including our work to provide land management advice for turtle dove, how habitat destruction can be avoided, and how the habitat requirements of this species can be better incorporated into the planning system, including through Biodiversity Net Gain.</p> <p>Stone-curlew Stone-curlews are listed on Annex I of the Birds Directive, as a species requiring special conservation measures concerning their habitat to ensure their survival and reproduction in their area of distribution. The species is also listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended), giving it special protection at all times: the Act makes it is an offence to intentionally or recklessly disturb any bird so listed whilst it is nest building or at (or near) a nest with eggs or young, or to disturb the dependant young of such a bird. Reckless damage, destruction or obstruction to a place used by species listed in Schedule 1 are also offences.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The consideration of habitat and wider ecological network is a consideration on the Policy ENV4 criterion 2.e.</p> <p>Both birds are identified through section 41 of the Natural Environment and Rural Communities Act, 2006, NERC which is currently being reviewed as part of the forthcoming Environment Act which includes the additional requirement to conserve and protect and a requirement to produce biodiversity reports. The Local Plan includes a reference in para 6.4.8 to priority habitats and species as defined by section 41 of the NERC Act 2006 and it is considered not necessary to specifically mention the two species listed.</p> <p>No specific modification have been suggested. No modifications are required in relation to ENV7.</p> <p>There is merit for clarification to include a further reference in para 22.1.4, section 22 Tattersett in relation to stone curlews. A modification is put forward at the relevant section of this schedule.</p> <p>Conclusion No Change proposed</p>	No	N/A

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				<p>Stone-curlews are highly sensitive to built development [1],[2], with harmful effects found at distances of up to 2000m, and highly sensitive to human disturbance at distances of up to 500m[3].</p> <p>Please also see our comments on Policy E7. The RSPB has a stone-curlew expert based in Norfolk (The Brecks) who would be happy to assist the Council regarding stone-curlew conservation.</p> <p>[1] Sharp, J.; Clark, R.T.; Liley, D.; Green, R.E., 2008. The Effect of Housing Development and Roads on the Distribution of Stone curlews in the Brecks.</p> <p>[2] Clark, R.; Liley, D., 2013. Further Assessment of the Relationship Between Buildings and Stone curlew distribution.</p> <p>3 Taylor, E.C., Green, R.E. & Perrins, J. (2007) Stone-curlews <i>Burhinus oedicnemus</i> and recreational disturbance: developing a management tool for access. <i>Ibis</i> 149, 37-44</p> <p>Proposed change We would like the council to consider these species in planning applications. The RSPB has data for both species and experts involved in their conservation who would be happy to advise. Stone-curlew should be referenced in policy E7 (see separate comment). The Plan could include Turtle Dove under 6.4 as a species not always protected by its presence at designated sites, but as one which should be considered as part of the suite of species possibly impacted by development during planning application reviews.</p>			
PC044	North Norfolk District Council	6.6 Protection of Amenity	6.6.6	<p>Reword second sentence in order to add clarity.</p> <p>‘To assess whether acceptable levels of daylight and sunlight are available to indoor habitable spaces, as well as outdoor amenity and open spaces, proposals will need to be in conformity with the guidance set out within the North Norfolk Design Guide.’</p>	<p>Agree modification to Para. 6.6.6.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/6.6/02
LPS343	Miss Natalie Beal (Broads Authority)	6.6 Protection of Amenity	6.6.7	<p>The Broads have intrinsically dark skies too, so please mention the Broads. The Broads and the setting of the Broads is protected at NPPF paragraph 176 and it also has dark skies, as per para 185 c.</p> <p>Proposed change:</p> <p>The Norfolk Coast Area of Outstanding Natural Beauty Partnership states 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 skylscapes, seascaapes and dark night skies that show the richness and detail of constellations." The Broads Authority also has</p>	<p>Comment noted, modification agreed to alternative paragraph 6.6.8.</p> <p>Para. 6.6.7 is considered to provide context regarding dark skies in North Norfolk and in particular, refers to the Norfolk Coast AONB Partnership. However, the Council acknowledges that clarity could be added to Para. 6.6.8, by including reference to The Broads, which refers to special attention to specific dark skies areas.</p> <p>Conclusion Agree to requested modification (part).</p>	Yes	PMIN/6.6/01

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				intrinsically dark skies that are protected through its Local Plan.			
LPS648	Mr Lyndon Swift (Weybourne Parish Council)	6.6 Protection of Amenity	6.6.8	In order to be effective, there should be restriction on development, not just on the lighting; there should only be a requirement for houses for local need. Weybourne is in sight of Kelling Heath Holiday Park, so development is likely to reduce the darkness of the skies at this site. Development in Weybourne therefore needs to be minimised to match LOCAL NEEDS AND NO MORE.	Comment noted. No specific modification is proposed. The Council does not consider it is necessary to amend Para. 6.6.8 as a result of the comment, which broadly relates to the restriction of development near one of the identified dark skies discovery sites. Conclusion No change proposed.	No	N/A
LPS237	Mr Michael Rayner (CPRE Norfolk)	6.6 Protection of Amenity	Policy ENV6	Applaud NNDC for seriously addressing the issue of light pollution but given draft form of emerging Design Guide, we attach CPRE Norfolk's position statement on light pollution to assist NNDC in adding detail to these policies and supporting text, or outside of this Regulation 19 consultation process, to their emerging new Design Guide.	Comment noted. No specific modification proposed. The Council does not consider it necessary to amend Policy ENV6 as requested. The Council's existing Design Guide SPD will be updated in due course, with the matter of light and noise pollution being material considerations within the document. Conclusion No change proposed.	No	N/A
LPS93	Dr Victoria Holliday	6.6 Protection of Amenity	Policy ENV6, Criterion 3(d)	It's very pleasing to see dark skies mentioned and disturbance by light pollution taken into account. However this seems to apply to developments themselves not to the wider settlement or landscape. In order to be effective, could point D cover the impact of light pollution on the wider landscape (especially the AONB) and settlement?	Comment noted. The Council does not consider it necessary to amend Policy ENV6, Criterion 3das requested. The proposed modification does not relate to the policy criterion, as criterion 3 concerns assessing the impact of development on the living and working conditions of existing and future occupants. The comment is adequately addressed in Policy CC13: Protecting Environmental Quality and Policies ENV1: Norfolk Coast AONB & The Broads and ENV2: Protection & Enhancement of Landscape & Settlement Character, where the wider impacts on settings and landscape characteristics are included in the policies. Conclusion No change proposed.	No	N/A
LPS320	Mr David Spray (Marine Management Organisation)	6.7 Protecting & Enhancing the Historic Environment	6.7	There is policy overlap between ENV7 and East Marine Plan Policy E – SOC2. Policies/Marine Plans could be signposted here with reference to the protection of marine heritage features which may exist within the intertidal zone encompassed in North Norfolk District Council Jurisdiction.	Comments noted. This section outlines the contextual information in relation to the district. No specific modification have been suggested. No modifications are required. Conclusion No Change proposed	No	N/A
LPS726	Mrs Debbie Mack (Historic England)	6.7 Protecting & Enhancing the Historic Environment	6.7.2	Change 'Historic Parks and Gardens' to 'Registered Parks and Gardens'.	Comment noted, modification agreed as requested. Conclusion Agree to requested modification.	Yes	PMIN/6.7/01
LPS607	Ms Kelly Harris (Thornage Parish Council)	6.7 Protecting & Enhancing the Historic Environment	Policy ENV7, Criterion 8	The use of the word 'Character' is inconsistent with Para 6.7.8 and the way that Conservation Area Appraisals are consistently titled, as produced by consultants, Purcells. Accordingly, the text needs to be corrected to read:	Comment noted, modification agreed to remove 'Character' from Criterion 8, as requested. Although the Conservation Area Appraisals themselves have differing titles, for example, the older documents refer to 'Character Appraisal', it is acknowledged that the plan should be consistent in its references to these documents. Conclusion Agree to requested modification.	Yes	PMIN/ENV7/01

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				8. Development proposals will conserve and where opportunities arise, enhance the character and appearance of Conservation Areas, where account will be taken of any relevant Conservation Area Character Appraisal and Management Plans in determining proposals.			
LPS727	Mrs Debbie Mack (Historic England)	6.7 Protecting & Enhancing the Historic Environment	Policy ENV7, Criterion 8	<p>This policy is much improved. We welcome the reference to heritage at risk. We also welcome the differentiation between exceptional and wholly exceptional scenarios. However, there are some remaining issues with the policy.</p> <p>In relation to non-designated heritage assets, reference should be made to the need for a balanced judgement.</p> <p>It would be helpful to include the Local List and Local List criteria as an appendix to the Plan.</p> <p>We note that some subheadings have been added. The Historic Environment Topic Paper helpfully charts the evolution of the policy. At one stage there were more subheadings in the policy. This made more sense. Whereas now, for example Conservation Areas are listed under non-designated heritage assets (when they are designated heritage assets). Therefore, we suggest that you consider reinstating the second version of the policy as drafted on page 18 of the Topic Paper.</p> <p>Replace with the draft version of the policy of page 17 of the Topic Paper. Refer to balanced judgement for non-designated heritage assets. Add Local List Criteria and Local List as an Appendix to the Plan.</p>	<p>Comments noted, modification agreed in part.</p> <p>The additional sub-headings of Conservation Areas, Archaeology and Heritage at Risk are proposed for clarity in reading the Policy. Reference to a balanced judgement is not considered necessary within the Policy wording. The inclusion of an Appendix within the plan is limiting, particular in terms of any updating. However, it is acknowledged that reference to. Including a link to the Local List criteria would add clarity to the plan at Para. 6.7.3.</p> <p>Conclusion Agree to requested modification.</p>	Yes	<p>PMIN/ENV7/02</p> <p>PMIN/6.7/02</p>
LPS94	Dr Victoria Holliday	6.7 Protecting & Enhancing the Historic Environment	Policy ENV7, Criterion 9	<p>In order to be effective, Point 9 should be changed to clarify that archaeological assets should be identified using an evidence-based methodology and a professional archaeologist should perform the archaeological evaluation.</p>	<p>Comment noted. The Council does not consider it necessary to amend Policy ENV7, Criterion 9 as requested.</p> <p>Para. 6.7.9 provides adequate detail regarding archaeological information in regard to development proposals. Norfolk County Council's Historic Environment Service would provide the necessary details and standards for development-led archaeological projects, on a case by case basis.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS133/ LPS208	Mrs Gemma Harrison (Holt Town Council, Cley Parish Council)	6.7 Protecting & Enhancing the Historic Environment	Policy ENV7, Criterion 9	<p>Change of wording proposed at Point 9, 'development proposals must identify assets of archaeological significance' not 'should'.</p>	<p>Comments noted. The Council does not consider it necessary to amend Policy ENV7, Criterion 9 as requested.</p> <p>When the whole of Criterion 9 is read in context, an archaeological evaluation is required for sites that are known or thought to have potential to include non-designated heritage assets with archaeological interest.</p> <p>Conclusion No change proposed.</p>	No	N/A

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PC121	North Norfolk District Council	6.8 High Quality Design	6.8.17	Amend reference to native species in order to futureproof the requirement to allow for climate change.	Agree modification to amend reference to 'appropriate native species planting' to Para. 6.8.17. Conclusion Agree to requested modification.	Yes	PMIN/6.8/02
PC046	North Norfolk District Council	6.8 High Quality Design	6.8.19	Amend first sentence in order to add clarity. The importance of high quality landscaping and green infrastructure upon the spaces around new development should not be underestimated during in the design stages. of new development.'	Agree modification as requested. Conclusion Agree to requested modification.	Yes	PMIN/6.8/03
PC045	North Norfolk District Council	6.8 High Quality Design	6.8.2	Correct title of document in last sentence to Building for a Healthy Life.	Agree to modification for clarity. Conclusion Agree to modification.	Yes	PMIN/6.8/01
LPS616	Mr Chris Johnson, Avison Young Ltd (National Grid)	6.8 High Quality Design	Policy ENV 8	National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets. In order to be consistent with national policy we would request the inclusion of a policy strand such as: 'x. taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.'	Comment noted. The Council does not consider it necessary to amend Policy ENV8 as requested. Criterion 1 has been worded to promote an integrated approach that 'reflects the characteristics of the site', which implicitly includes consideration of existing infrastructure. Conclusion No change proposed.	No	N/A
LPS103	Dr Victoria Holliday	6.8 High Quality Design	Policy ENV 8, Criterion 1	In order to be effective, the beginning of Criterion 1 should be re-worded to 'All proposals will enhance the characteristics of the site and conform to the distinctive local character in terms of design, layout...' In addition Criterion 1 (k) should be created to state 'Proposals will conform to national guidelines on controlling light pollution.'	Comment noted. The Council does not consider it necessary to amend Criteria 1 and add a further Criteria after 3j) as requested. Criterion 1 refers to an integrated approach to design, setting out the matters that should be taken into account. This criterion is not intended to be prescriptive. The matter of light pollution is covered in other policies and the Council's existing Design Guide SPD will be updated in due course, with the matter of light and noise pollution being material considerations within the document. Conclusion No change proposed.	No	N/A
LPS609	Ms Kelly Harris (Thornage Parish Council)	6.8 High Quality Design	Policy ENV 8, Criterion 2	A footnote should be provided in order to link or cross-reference to the Health Protocol and its intended meaning. As an important document, this requires rectification.	Comment noted. The Council does not consider it necessary to provide a footnote as requested. Given the nature of Policy ENV8, the supporting text has been made comprehensive in order to address the matters covered in the policy. The Health Protocol is discussed at Para. 6.8.2. There is an existing footnote for the Planning in Health Protocol document on page 72 of the plan – footnote 61, which relates to Para. 5.1.6. Specific reference to the document is also made in Policy HC1: Health & Wellbeing. Conclusion No change proposed.	No	N/A

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LPS771	Mr Mark Behrendt (Home Builders Federation)	6.8 High Quality Design	Policy ENV 8, Criterion 2	<p>At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons:</p> <ul style="list-style-type: none"> Requirements to conform to supplementary guidance are not consistent with legal requirements of local plans. <p>We would therefore recommend that the policy be amended to state that development should have 'regard' to the SPD.</p>	<p>Comment noted. The Council does not consider it necessary to amend Policy ENV8, Criterion 2 as requested.</p> <p>Criterion 2 is caveated in order to provide flexibility, so that should a proposal not be in conformity with the North Norfolk Design Guide, a justification would be provided for any such departure.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS442	Mr Jake Lambert, Bidwells (Hopkins Homes)	6.8 High Quality Design	Policy ENV 8, Criterion 3 (b)	<p>In order to be effective, and justified, Criterion 3b of this policy should be amended to recognise instances when removal, or partial removal, of natural features is necessary to facilitate development proposals. Without this caveat, the policy risks restricting the necessary facilitating works required to serve the development site, thereby rendering the policy ineffective and in conflict with Paragraph 35(c) of the NPPF.</p> <p>Part 3b of the policy should be amended accordingly:</p> <p>'Retains existing important landscaping and natural features wherever feasible and practical, and includes landscape enhancement schemes...'</p>	<p>Comments noted. The Council does not consider it necessary to amend Criterion 3b) as requested.</p> <p>Criteria 3 is caveated at the beginning by stating that 'All proposals will be expected to demonstrate a high quality of design. As such, the proposed amendments are not required in order for there to be flexibility within the policy.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS481	Mr Jake Lambert, Bidwells (Crisp Malting Group)						
LPS408	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Group & Lovell Partnerships)						
LPS67	Tracey Bayfield (Blakeney Parish Council)	7 Housing	Section 7	<p>The plan is deficient in not including reference to second homes. In Blakeney, nearly half the homes are second or holiday homes. This is inflating prices and putting housing out of reach of local people. It creates a non-sustainable village, in danger of being comprised of "incomers" with local people driven out. Whilst we understand the difficulty of controlling second home ownership, this could, as a first step, be applied to new builds.</p> <p>Wish to see more emphasis on affordable housing, so that whole estates could be made affordable without developers having the opportunity to include market housing and the affordable housing being reserved for local people.</p> <p>Blakeney is experiencing considerable development with one house being demolished and a large number of new homes being built on the site. We would wish to see controls on that, so that one house could not be replaced by multiple dwellings.</p>	<p>The issue of second homes, principal residency and possible impacts on the housing market and what measures, including how land use planning could be used to influence and mitigate perceived negative impacts has been investigated by the Council. These matters were fully considered at Overview and Scrutiny Committee, July 2022 and set out in the impact of second homes report. The Council supports further legislative changes to enable the retention of increased tax revenue collected by 2nd tier authorities and a request that all second and holiday homes require planning permission.</p> <p>The Plan provides for affordable housing in line with national policy including through allocated sites and rural exception policy. The inclusion of market housing in mixed tenure schemes is an important source of additional funding and delivers a significant number of affordable homes. The Plan includes policies which support the provision of exclusively affordable developments via the rural exception policy. No limit is placed on the number of such schemes which are subject to Local Lettings restrictions</p> <p>The Plan as a whole includes appropriate safeguards to manage the potential adverse impacts of replacing single dwellings with a greater number of units. Including a policy which would prevent such developments as a matter of principle would unduly restrict the opportunities for the efficient use of available land in sustainable locations.</p> <p>The change of use of primary residences to holiday accommodation does not require planning permission and is not a matter which can be controlled via Local Plan policy. The Authority is supportive of possible changes in national legislation to introduce the need for planning permission for such proposals. The Council has carefully considered the effectiveness of principle</p>	No	N/A
LPS123	Mr John Edwards			<p>Section 7 does not address the specific need for housing for local residency in the settlements adjoining the Heritage and Undeveloped Coast area, and in particular in the largest settlement, Wells-next-the-Sea. This need is outlined in the 'Housing Needs Assessment for Wells, Holkham, Walsingham, Warham and Wighton Final Report - March 2021' previously supplied. Further, median house prices (ONS data) are at twice the District level, and second and holiday home ownership is at the highest level in the District. The strategic</p>			

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LPS284 LPS649 LPS758	Mrs Clare Stagg Mr Lyndon Swift (Weybourne Parish Council) Mr Lyndon Swift (Weybourne Parish Council)		Para 7.1.1 Policy HOU 1	<p>approach needs consideration of the utility of 'principle/primary residence' as in other parts of the Eastern and the South West Regions of the UK.</p> <p>Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is, is surely for locals.</p> <p>The figure of 8-10% of houses being second homes implies that about 1,200 of the houses to be built are likely to be second homes.</p> <p>There needs to be some form of restriction or covenant on the use of these new houses as second homes. Planning permission should be required for changing a property from a primary residence to a second home, and permission should be denied in villages where the proportion of holiday homes is, would become, higher than the viable level.</p> <p>There should be restrictions on primary residences becoming holiday homes. This should at the very least require planning permission, and the effect on the local community should be taken into account when deciding on whether to approve or not.</p>	<p>residence restrictions on new dwellings but does not currently consider that such restrictions are likely to be effective.</p> <p>The Local Plan cannot determine which types of development requires planning permission as this is determined in separate national legislation. The use of an existing home as a second home does not require planning permission.</p> <p>The Plan is required by the NPPF to address all housing needs not just those arising from the existing local population. This includes addresses the needs of those moving into the area.</p> <p>The Plan includes policies to support and delivery affordable homes, including those required for local people, through the allocation of development sites, lowering site sizes above which affordable homes should be provided, and the rural exceptions policy.</p> <p>Primary residence restrictions on the small number of new dwellings proposed in villages are unlikely to be effective as the demand for second homes is likely to be deflected into the existing housing stock where planning permission is not required.</p> <p>The Council supports introduction of a need for planning permission for change of use from a principle to a second/holiday home and supports draft measures in the Levelling Up and Regeneration Bill to introduce these but such changes in national legislation are not matters which can be introduced via a Local Plan.</p> <p>Conclusion No changes proposed.</p>		
LPS284	Mrs Clare Stagg	7 Housing	Section 7	<p>Policy should protect all current village amenities. The Plan should support new retail / A4 uses and enshrine in policy strong protections of existing amenities.</p> <p>This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment.</p>	<p>Protection of existing facilities is provided in Policy HC 3.</p> <p>New, small-scale retail and other uses are supported within the development boundaries of Selected Settlements in Policy SS1.</p> <p>No specific modifications have been suggested and no modifications are required.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS72 LPS83	Dawn Moore Mr Paul Harris (Broadland District Council)	7 Housing 7.1 Delivering Sufficient Homes	Section 7 / Section 14.3 Policy HOU 1 / NW62/A	<p>The strategy for housing in North Walsham completely fails to take into consideration the negative effects of increased traffic volumes on Station Road in Coltishall.</p> <p>Identify by means of a study and then address the problems associated with the B1150 at Station Road in Coltishall.</p> <p>Substantial additional growth in North Walsham could significantly increase the traffic volumes felt on the arterial routes into Norwich, particularly the B1150 and also the</p>	<p>Policy CC9 requires Traffic Impact Assessment for all larger development proposals and the need for such assessment is referenced in the Plan, including in the preamble to Policy CC9 (para 14.3.4). Given the scale of this proposal, explicit reference to this requirement in the Site Allocation Policy (NW62/A) would add clarity.</p> <p>The allocation referred to is supported by the County Council as Highway Authority. The approach is supported by a broad range of transport assessments undertaken in cooperation with the Highways Authority and their consultants (WSP).</p> <p>Further detailed worked has been commissioned.</p>	No	N/A

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				<p>B1145/A140 and A1151 and that the Plan should consider and address any potential impacts on these roads.</p> <p>A feasibility study into the North Walsham Link Road dated November 2020 does not appear to consider wider impacts beyond the built-up area of North Walsham and the key traffic routes into the town in the immediate vicinity of that area.</p> <p>It is unclear to what extent the transport model used has specifically considered other planned growth in the area at Coltishall e.g. additional employment growth at Scottow Enterprise Park. Also, there appears to be no assessment of recorded accidents within the area, the reason for these accidents and the effect that the identified increase in traffic might have on these.</p> <p>Modification</p> <p>Broadland District Council considers that it is necessary to prepare and/or provide proportionate evidence in relation to the proposed growth at North Walsham to effectively address the soundness issues outlined in the Council's response. North Norfolk District Council should engage with the Broadland District Council and Norfolk County Council as part of the process of preparing and/or providing this evidence.</p>	<p>Modification is proposed to Policy NW62/A for reasons of clarity. Add additional criterion under the 'Sustainable Transport' heading – '14. Submission of a Transport Assessment to include consideration of the impacts (with mitigation required) on the surrounding network including the route to Norwich via Coltishall.'</p> <p>To add clarity, modify Policy NW62/A to require submission of TIA explicitly requiring consideration of off-site impacts including at Coltishall.</p> <p>Conclusion A modification is raised under site allocation NW62/A</p>		
LPS649	Mr Lyndon Swift (Weybourne Parish Council)	7.1 Delivering Sufficient Homes	Para 7.1.1	<p>If the population growth is projected to be less than 8,000 people it is not clear why there is a need for 9,600 houses.</p> <p>It is our understanding that the 9,600 new houses does not include social housing, so in fact there are likely to be more than the 9,600 new houses. Why is social housing not included in the total?</p> <p>Community-led developments are likely to meet local needs better, to meet less local opposition, and to fit better into the local area.</p> <p>The Plan needs to be based on more realistic forecasts of actual local need. Housing development should be focused on creating accommodation for families and people of working age who will be the lifeblood of communities.</p>	<p>The need for new homes is not derived solely from population growth, the way the existing housing stock is used including factors such as people living longer, smaller household sizes, older people remaining at home for longer and other factors influence the need for new homes. Furthermore, the standard national housing needs methodology, and the local variation used by the Council, also requires a significant 'affordability' uplift. All homes needed and provided, including affordable homes are included with the total requirement and once built count towards the target.</p> <p>Agree that community led developments are well placed to address locally identified needs and these are positively supported in Policy SS3.</p> <p>The Plan must address all of the identified needs including, but not limited to, those of working families. The housing mix policies of the Plan (HOU2-HOU5) are designed to ensure that future housing provision is closely aligned with the needs identified in the evidence.</p> <p>No specific modifications have been suggested and no modifications are required.</p> <p>Conclusion No change proposed</p>	No	N/A

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LPS650	Mr Lyndon Swift (Weybourne Parish Council)	7.1 Delivering Sufficient Homes	Para 7.1.4	The Plan admits that the 2014 estimates were inaccurate. According to 7.1.3, "household projections ... are published every two years by the Office for National Statistics". This means that there should have been estimates for 2018 and 2020, and that the current Plan does not accurately reflect the "objectively assessed needs" of the District.	Population and household projections are typically published two years in arrears. The 2018 based projections are now available and once adjusted for longer term migration show similar growth rates to the 2016 based figures used in the Plan. The 2020 based figures are yet to be published.	No	N/A
LPS420	Sarah Peters (ABZAG Ltd)		Para 7.1.8	The Plan should use the most recent statistics in order to more accurately reflect the "objectively assessed needs" of the District.			
LPS441	Mr Garth Hanlon (Savills UK Ltd)		Policy HOU 1	Failure to use the standard national methodology. The correct population numbers and estimates should be used. Then calculate the correct OAN for housing numbers.	National policy allows a departure from the standard methodology if exceptional circumstances justify such an alternative approach. Explanation is provided for the Council's deviation from the standard methodology. The 2014 based projections are not a sound basis for establishing OAN in North Norfolk and it has been previously accepted via Public Inquiry that the extent of UPC errors constitutes exceptional circumstances which justify not using the 2014 based projections. It is considered that the plan accurately reflects the objectively assessed needs of the area.		
LPS324	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)		Policy HOU 1	There are no exceptional circumstances that justify a departure from the Standard Method and 2014-based SNHPs, and the use of the 2016-based SNHPs instead. The Standard Method should be used for North Norfolk, resulting in an average annual housing need of 531 dpa (a total of 10,620 over the 20-year plan period). The case for 'Unattributable Population Change' (UPC) constituting exceptional circumstances still needs to be successfully demonstrated through the examination of the Local Plan. If it can be demonstrated that UPC constitutes an exceptional circumstance in North Norfolk then we agree that the most appropriate alternative methodology is to use more up to date household projections where UPC issues have been corrected. Object to the use of the 2016-based figures as there is no justification for not using the more up to date 2018-based household growth projections that were published in June 2019. [a table is provided using the standard method to calculate LHN using both the 2016 and 2018 based projections]	The Council does not consider the policy needs to be altered. Conclusion No change proposed		
LPS387	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)		Policy HOU 1	Recommendation: Policy HOU 1 needs modifying to set a housing requirement based either on the standard method or, if exceptional circumstances justify an alternative approach, the most recent 2018-based projections and with the longer plan period set out in our representations above. We also consider that the wording should be changed to refer to the number of homes as the housing requirement and not an "aim to deliver":			
LPS772	Mr Mark Behrendt (Home Builders Federation)						

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LPS538	Mr Alastair Curran, Planning Places Ltd (FW Properties Ltd)		Policy HOU 1	<p>Policy HOU 1 - Delivering Sufficient Homes – Recommended Amendments</p> <p>1. The Council will aim to deliver Local Plan sets a minimum housing requirement of 9,600 12,320 new homes over the plan period 2016-20368”*</p> <p>* This figure is the 2018-based requirement, but if the Council fail to justify exceptional circumstances, the standard method figure should be used.</p> <p>The 2014 housing figures should be utilised for accounting the housing need, or a new study commissioned which takes into account the recent migration to North Norfolk following the pandemic to ensure the correct figures are being used.</p> <p>It is considered that to meet this additional need, (or the proposed need) that more housing will be required, and as such, as a minimum, the original quantum of development should be reinstated for allocation HV01/B.</p>			
LPS420	Sarah Peters (ABZAG Ltd)	7.1 Delivering Sufficient Homes	Para 7.1.8	<p>Buffer (7.1.8.) of 5% is too small as continue to fail to deliver homes needed. Extra over 9,600 all either ‘windfall’ of unallocated Small Growth Villages which are unlikely to deliver. Housing delivery needs to be based on more than numbers which are just wishful thinking.</p> <p>Windfall developments 1,890 plus 452 (SS1) unrealistic – 2,342 homes delivered through unallocated sites, over 24% of the 9,600. This is not good planning.</p> <p>Dwellings with permission or completed total – 4,815. Allocated – 4,900</p> <p>This will result in close to 25% of the homes delivery plan is on a ‘wing and a prayer’, which demonstrates that the NNDC Local Plan is NOT SOUND.</p> <p>Use the correct population numbers and estimates. Then calculate the correct OAN for housing numbers.</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District as a whole. All aspects of future supply including windfall allowances and growth in Small Growth Villages have been carefully considered and evidenced. Paragraph 7.1.8 correctly quotes the NPPF requirements for 5% buffers for five-year land supply calculations.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS232 / LPS233 / LPS228 / LPS229	Ms Gabrielle Rowan, Pegasus Group (C & S Norfolk Ltd)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>This Policy identifies that 918 homes should be provided in Small Growth Villages. This level of growth is supported and it is considered that this should ensure the future growth and vibrancy of these important sustainable settlements.</p> <p>Considers that flexibility is allowed within this housing provision. It is understood that this figure is derived from a 6% calculation of growth based on the existing settlement size as set out in Policy SS1. It is important to ensure that this</p>	<p>Support noted.</p> <p>The 6% allowance is calculated at a fixed point in time (2011 census data) and produces a proportionate growth allowance for the remainder of the Plan period and does not require updating.</p>	No	N/A

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				<p>6% calculation is based on the most up-to-date census information i.e., figures in HOU1 and SS1 Table 2 should be revised if new census data is available and an adjustment to the 6% calculation needs to be made. Any adjustment needs to be reflected in Policy SS1 also.</p> <p>Policy HOU1 should be amended to allow for flexibility in relation to number of homes provided in Small Growth Villages if ONS data shows a change in population size.</p>	<p>Conclusion No change proposed</p>		
LPS324	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>In the context of the Council's ongoing difficulties with maintaining a sufficient supply of housing land, we consider that it is essential that a substantial supply buffer is included in the Local Plan. We recommend a buffer of at least 20%. To achieve this, given our recommendation for increasing the housing requirement, the housing supply will also need to be increased to ensure that this buffer is maintained.</p> <p>Our calculation of the Council's Local Housing Need for 2016-2038 is 12,320 dwellings (based on 2018 projections). We would therefore recommend increasing the proposed housing supply to 14,784 dwellings to ensure a deliverable 5year supply across the plan period. This would require the allocation of further sites sufficient to deliver a further 4,185homes (14,784 – 10,599 existing supply).</p> <p>We consider that it is essential that a substantial supply buffer is included in the Local Plan. We recommend a buffer of at least 20%. To achieve this there will of course need to be additional growth apportioned to each tier of the settlement hierarchy with an additional impetus provided throughout the policies of the plan (Policy SS1 in particular) to ensure that appropriate sustainable sites come forward swiftly and without burden and that best use is made of all appropriate development opportunities across the district.</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District.</p> <p>National policy allows a departure from the standard methodology if exceptional circumstances justify such an alternative approach. Explanation is provided for the Council's deviation from the standard methodology. It is considered that the plan accurately reflects the objectively assessed needs of the area and includes appropriate delivery buffers.</p> <p>Current delivery constraints relate to Nutrient neutrality and will not persist and do not justify the inclusion of larger buffers</p> <p>The Council does not consider it necessary to amend the policy as requested.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS311	Alex Muro, Armstrong Rigg Planning (Westmere Homes)						
LPS136	Mrs Gemma Harrison (Holt Town Council)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>More growth needs to be identified for Holt on the land south of the bypass. NNDC need to go further to accommodate the existing and future demands for housing stock in Holt. The plan needs to be fit for purpose and provide the growth needed for the town in the next 15 years to make the plan viable and work for Holt. Therefore, the housing numbers should be significantly increased from 207 new allocations contained in the plan.</p>	<p>The Plan includes significant growth in Holt over the Plan period and takes full account of the environmental constraints impacting the town.</p> <p>Conclusion No change proposed</p>	No	N/A

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LPS167	Miss Naomi Chamberlain (Norfolk County Council)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>The County Council welcomes the further details provided on how the housing figures have been calculated and whilst we support the broad housing numbers it is suggested that local plan period should be amended to 2020-2036 and reflect the latest government figures of 552 houses per annum.</p> <p>The County Council welcomes the distribution of housing set out in table 5, which enables the planning and provision of supporting infrastructure in these identified locations.</p>	<p>Support noted.</p> <p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District.</p> <p>It is considered that the Plan provides for 15 years growth, and a policy framework which can be applied over 15 years in the way anticipated in the NPPF.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS227	Ms Sarah Mitchell (RSPB)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Given the risks identified in the Likely Significant Effects screening of the HRA, we would welcome an additional bullet point to acknowledge this risk with reference made to HRA requirements for international sites.</p> <p>An additional bullet point could mirror text used elsewhere in the Plan 'Submission of adequate information in order to undertake a project Level Habitat Regulation Assessment, addressing issues relating to important species and habitats to mitigate impacts on European sites, will take place.</p>	<p>The Council does not consider it necessary to amend the policy as requested. Matters relating to HRA requirements are adequately covered elsewhere in the plan.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS304 / LPS305	Mr Sam Hazell, Lawson Planning Partnership Ltd (White Lodge Norwich Ltd)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Policy HOU1 states, the Council will aim to deliver a minimum of 9,600 new homes over the plan period 2016-2036. As part of this total a minimum of 2,000 affordable dwellings will be provided. To achieve this, specific development sites suitable for not less than 4,900 new dwelling are allocated. However, the 'Dwellings provided on Allocated Sites inclusive of specialist elderly accommodation' column total is only '4,764'.</p> <p>Small Growth Villages are apportioned 7.6% of overall housing growth amounting to 452 dwellings, which is included in the Allocations Sites column. However, these are in fact not allocations. Table 2 Small Growth Villages Apportionment states, the 452 figure is indicative only, and their delivery is not sufficiently certain based on the evidence prepared in support of the Plan, as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>Policy HOU1 will not therefore, achieve its purpose to ensure that all existing and future housing needs are met in suitable locations.</p> <p>In order to ensure that all existing and future housing needs are met in locations that comply with the Settlement Hierarchy, the Plan should be modified to identify site allocations for housing developments of appropriate scale at</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District.</p> <p>It is not considered appropriate in the smaller and more rural villages to allocate larger scale market housing. However, growth at an appropriate scale that reflects the character of the villages has the potential to aid their vitality and the viability of existing services and make a modest but important contribution to housing delivery.</p> <p>The Authority has carefully considered the delivery of growth from this source.</p> <p>Conclusion No change proposed</p>	No	N/A

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				Smaller Growth Villages. The amended Small Growth Villages Strategy approach and subsequent housing site allocations in Small Growth Villages should be reflected in Policy HOU1 accordingly, and as set out in detail in the representations letter dated 1st March 2022, attached.			
LPS371	Ms Erica Whettingsteel, EJW Planning (Glavenhill Strategic Land)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>The table set out in the Policy HOU1 allocates 5.9% of growth to 'all remaining settlements and countryside'. This runs contrary to Policy SS1 which states that outside of the settlements listed in the hierarchy the remainder of the District is considered as countryside where development will not be permitted unless it is of the type allowed by Policy SS2 Development in the Countryside. The table needs to provide further clarity to provided consistency with Policy SS1 as currently worded it is misleading.</p> <p>The table in Policy HOU1 needs amending to ensure that the Plan is effective and positively prepared.</p>	<p>HOU2 is consistent with Policy SS1 which refers, under criterion 4, to '[t]he rest of North Norfolk, including all settlements not listed above, is designated as Countryside Policy Area...'</p> <p>The Council does not consider the policy needs to be altered.</p> <p>No specific modifications have been suggested and no modifications are required.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS371 LPS539	Ms Erica Whettingsteel, EJW Planning (Glavenhill Strategic Land) Mr Alastair Curran, Planning Places Ltd (FW Properties Ltd)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>The table anticipates windfall development at 15.6% or 1890 dwellings over the plan period, equating to 126 units per annum. It is overly optimistic to assume that sites that are not currently identified will become available and yield occupations within any five year housing land supply assessment. Furthermore, it is known that a boom market is needed to persuade people to sell off garden land or change from an existing use to an alternative use (especially previously developed land with clean-up costs etc. after an existing use value is ascertained). Otherwise, value is just not there. We are currently experiencing such a boom and with windfalls being finite, and with such a flow having been maximised in the past 2-3 years (and currently) it is unrealistic to assume the rates of delivery anticipated in the plan.</p> <p>The plan relies upon windfall developments to meet 15.6% of the housing provision which equates to 1890 dwellings. This equates to the equivalent level of development as proposed in a Large Growth Town. Although North Norfolk has seen regular windfall developments since 2016, (averaging approximately 135dpa) this is not considered to be a reliable source of housing. The proposed provision of windfall development is 135dpa and provides no safety net for under delivery.</p> <p>It is considered the best option would be for existing allocations should be re-evaluated to see how they can potentially deliver either more dwellings, such as allocation</p>	<p>The NPPF allows for the inclusion of windfall allowances as part of the strategy to deliver growth and in a large mainly rural area windfalls can, and do, make a significant contribution towards housing delivery.</p> <p>The Council has been realistic in reducing its expectations in relation to future windfall housing to a rate which equates to around 50% of the historic rate and has carefully assessed the likely future supply of development derived in this way. No further reduction is justified or necessary.</p> <p>No specific modifications have been suggested and no modifications are required.</p> <p>Conclusion No change proposed.</p>	No	N/A

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				HOV1/B though extending the site boundary and reinstating the original plan to deliver 150 dwellings on the site.			
LPS772	Mr Mark Behrendt (Home Builders Federation)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Starting point for windfall allowance is unjustified. Concerned that there is considerable overlap between the delivery of existing permissions with the Council only deducting a single year of windfall to ensure there is no double counting. This is insufficient and will not eliminate double counting of permissions in the windfall allowance over the first five years of the local plan.</p> <p>Council should exclude windfall from the first three years of the five-year housing land supply. This would push back the inclusion of a windfall allowance to at least 2023/24 in the published housing trajectory.</p>	<p>The starting point for windfall allowances is justified in paragraph 7.1.7, the housing Trajectory, Background Paper 1 and associated land supply statements. The windfall delivery rate used in the Plan includes a significant discount on historic rates (50% reduction) and no allowance for the first year. These two measures avoid any potential for double counting.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS425	Mrs Raj Bains, Boyer Planning (Richborough Estates)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>We strongly consider that the Council have overestimated the level of supply likely to come forward as set out in the housing trajectory in the emerging plan. The majority of housing provision is expected be delivered from proposed site allocations (5,408 dwellings) to which no evidence is provided to support these projections.</p> <p>Raises concerns about deliverability of North Walsham Extension. Ultimately, the emerging plan fails to provide an adequate supply of housing throughout the plan period, particularly in the short and medium term.</p> <p>As the Local Plan has not considered alternatives or reserved sites in the absence that a proposed strategic site fails to come forward, we would suggest that the Local Plan is reviewed so that it includes a separate policy to allow for flexibility of housing provision to come forward over the course of the plan period.</p> <p>To ensure the Local Plan achieves the overall housing requirement and to help safeguard housing provision and to provide for a resilient plan, we would suggest that Policy SD3-Settlement Hierarchy of the First Draft Local Plan (Part 1) is reinstated where a number of sites are identified in selected settlements for growth.</p> <p>We would also suggest that land at Paston Gateway, is allocated within the emerging plan to ensure a sufficient amount of housing are available in the short and medium</p>	<p>The Council has carefully considered the delivery of allocations including the large allocation at North Walsham and has worked closely with promoters and developers to ensure that expected delivery rates are realistic.</p> <p>The Plan includes a range of allocated sites of different sizes and broadly distributed in order to assist with delivery including at North Walsham.</p> <p>National Policy, and the Plan in Policy CC 1, makes clear that, should planned growth be delayed, a presumption in favour will be applied to applications to address land supply issues. No further allocations are justified.</p> <p>Conclusion No change proposed</p>	No	N/A

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				term (0-10 years of the plan period), particularly in North Walsham. We consider Land at Paston Gateway would be a suitable site that would be complementary for the Council to allocate alongside the proposed SUE, to ensure there is sufficient housing delivered over the plan period.			
LPS651	Mr Lyndon Swift (Weybourne Parish Council)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>The table gives a total of 12,096 houses, of which 4,815 already have been built/have planning permission; since the target is 9,600, there is plenty of capacity for the required number of houses to be built, without the need to inflict additional developments on “small growth villages” and rural areas.</p> <p>The Plan needs to be based on more realistic forecasts of actual local need, and to avoid expansion of small villages simply to meet a quota.</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet all of the assessed housing needs of the District. Of the 12,096 dwellings included in the table some of the larger sites are not expected to deliver during the plan period.</p> <p>It is not considered appropriate in the smaller and more rural villages to allocate larger scale market housing. These locations are proposed to contribute around 8% of total dwellings across 22 selected villages with the scale of growth in each being proportionate to their size. Growth at an appropriate scale that reflects the character of the villages has the potential to aid the vitality and the viability of existing services and would accord with national policy which supports growth in village locations.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS419	Mr Garth Hanlon, Savills UK Ltd (Holkham Estate)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Policy fails to meet the housing needs of the area. Further land should be allocated in Wells-next-the-Sea.</p> <p>In the event where the Council or the Inspectors would support the extension of the existing allocation to include more land to provide more housing, then this would mean the necessarily amendment to Policy HOU1 of the plan to account for the proposed extra number of dwellings on site W07/1 as well as changes to Policy W07/1.</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District. The Plan takes account of identified needs but must also consider the environmental aspects of sustainability including impacts on the AONB.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS422	Mr Garth Hanlon, Savills UK Ltd (Holkham Estate)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Policy fails to meet the housing needs of the area. Further land should be allocated in Wells-next-the-Sea. HOU 1 should be amended to include a new allocation of a parcel of land off Warham Road in the numbers.</p> <p>In the event that the Local Plan requires amendment to include the proposed allocation it is proposed that Policy HOU1 is amended to account for any proposed new allocation in the event that a new policy is inserted within Chapter 17 of the Local Plan.</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District. The Plan takes account of identified needs but must also consider the environmental aspects of sustainability including impacts on the AONB.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS541	Mr Alastair Curran, Planning Places Ltd (FW Properties Ltd)	7.1 Delivering Sufficient Homes	Policy HOU 1	The Plan fails to support sufficient delivery of elderly accommodation, in an even and dispersed strategy across the district. Only certain settlements are selected for elderly accommodation, with large areas of the district excluded, partially due to the rural nature of the south and west. This	The site specific allocation requirements for elderly persons accommodation are not intended to address all needs and are expressed as minimums allowing for greater provision.	No	N/A

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				<p>would mean that certain localities would see older residents having to relocate in later life, resulting in unsustainable travel for their respective friends and family having to visit care facilities.</p> <p>Additionally, the table states that dedicated elderly accommodation shall be provided at a ratio of 1.5:1 whereas in Hoveton, for example, the allocation is suggested at delivering 40 elderly accommodation units and 120 dwellings (a ratio of 3:1). It should be highlighted that the allocation policy states a delivery of 60 units (a ratio of 2:1). The ratio is even worse on other sites though, as per the table in policy HOU1. The existing site allocations do not equate to the necessary ratios the policy requires, which already proposes an unjustified and ineffective strategy for securing the necessary accommodation spaces for elderly people.</p> <p>It is considered that the provision of elderly care facilities across the district needs a revision, and a greater emphasis placed upon delivery elderly care facilities. This could be resolved through either more allocations, or preferably, increasing the allocated sustainable site boundaries (such as HV01/B) to be able to accommodate more spaces.</p>	<p>A number of policies in the Plan are aimed at addressing the needs of the elderly including HOU 8 (Accessible and adaptable homes), Policy SS 2 (Development in the Countryside) which supports the provision of specialist accommodation for the elderly infirm and others requiring care where there is a demonstrable need for the development and where alternative sites within defined settlement boundaries are shown not to be available or suitable.</p> <p>The 60 unit requirement is derived from the preferred delivery model of mainstream providers rather than a set proportion related to the number of dwellings on a site and is intended to ensure that sites are available and attractive to the market. Whilst the allocated site at Hoveton falls below the site size threshold in Policy HOU 2 a mixed-use allocation is nevertheless made, including elderly persons accommodation, to ensure that provision is made in this part of the district.</p> <p>Conclusion No change proposed</p>		
LPS540	Mr Alastair Curran, Planning Places Ltd (FW Properties Ltd)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>The draft Regulation 19 Local Plan has seen housing allocations reduced across the district considering recent changes to national policies to enable the better integration of green infrastructure (tree lined streets) and the new National Model Design Guide. This approach is considered ineffective, and unjustified as it results in less development in highly sustainable locations where the Council has already undertaken work and ascertained its need.</p> <p>Due to the reduction in dwellings proposed, such as at site HOV1/B, North Norfolk are now proposing 147 less dwellings in total than at Regulation 18, instead relying more on windfall to take this additional pre-determined need. This is at odds with the purpose of the 'plan led planning system.' Instead, existing sites should be expanded, where this is both possible and feasible to do so, such as in Hoveton in HOV1/B, to ensure sites deliver the necessary statutory requirements of well-designed places, but also that sustainable settlements, such can grow as planned.</p> <p>It is considered that sites return to the original planned development at Regulation 18, and where possible these sustainable locations be expanded geographically to accommodative any legislative requirements.</p>	<p>The Council does not consider the policy needs to be altered.</p> <p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District. The Plan sets the figures of around 480 dwellings per year or 9,600 new homes in the plan period as the minimum target. As a measure to extend choice and flexibility, the plan includes specific allocations and policies which would enable the delivery of around 12,000 homes.</p> <p>The Council has been realistic in reducing its expectations in relation to future windfall housing to a figure which equates to around 50% of the historic rate and has carefully assessed the likely future supply of development derived in this way.</p> <p>No specific modifications have been suggested and no modifications are required.</p> <p>Conclusion No change proposed.</p>	No	N/A

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LPS535	Mr Alastair Curran, Planning Places Ltd (Ilex Homes)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>The nominal allocation of only 207 units [for Holt] is not considered to be sufficient for the next 14 years, for such a substantial settlement, without allowing for greater windfall development opportunities. Instead, allowing development that is either adjacent to, or well connected to the settlement would aid in securing the necessary economic and social growth to sustain the existing town whilst facilitating appropriate growth. This would therefore result in a more effective and justified strategy to see the necessary housing delivery for Holt.</p> <p>It is considered that the current plan, in terms of protected long-term growth for Holt is unsound. Instead, there should be further allocations, of a smaller scale, as per paragraph 8.4.4 of the preamble, or HOU1 should allow for future windfall schemes to come forward either adjacent to or within close proximity of Holt.</p>	<p>The total proposed growth in Holt over the Plan period including built, commitments and new sources of supply is around 760 dwellings and is significantly higher than other Small Growth Towns.</p> <p>Paragraph 8.4.4 is concerned with retail and town centre development so is not directly related to Policy HOU 1.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS618	Alicia Hull & Peter Crouch	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Given the number of houses already built and those with planning permission, the Council should concentrate on affordable and secure rented property – council housing is the best way forward, both for residents and for the climate.</p> <p>As many as possible of the 480 houses needed each year should be from existing buildings. The requirement should say that converting buildings is the first option. And this priority should allow the strict assignment of numbers of housing to villages, etc., to be more flexible.</p>	<p>Comments noted. The Local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the District.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS772	Mr Mark Behrendt, (Home Builders Federation)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Plan period is not consistent with national policy and should be extended to at least 2037/38. Does not need to look backwards though, so new plan period should be 2021/22 to 2038/39.</p>	<p>It is considered that the Plan provides for 15 years growth, and a policy framework which can be applied over 15 years in the way anticipated in the NPPF.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS748	Mr Philip Atkinson, Lanpro Services (Glavenhill Strategic Land)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>Seeks amendments to policy HOU1 to recognise the potential of Badersfield to deliver new and innovative economic growth enabled by additional new housing provision in this sustainable growth location. Also seeks the removal of references to Badersfield being an unsustainable location for new growth within NNDC area in the emerging Local Plan. This is because being the acknowledged third largest employment centre in the District and well served by existing housing and day-to-day facilities this simply cannot be the case that it is unsustainable.</p>	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested. The Council has carefully considered the distribution of proposed growth having regard to a range of considerations, including the need for development, particularly affordable homes, capacity of places to support growth having regard to key infrastructure, services and environmental constraints. The Plan focuses growth in areas that will maximise the use of existing infrastructure (including water) and will allow infrastructure providers to plan for new facilities in the most efficient way.</p> <p>Conclusion No change proposed</p>	No	N/A

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LPS804	Mr Steve Kosky, Turley (Pigeon Investment Management Ltd)	7.1 Delivering Sufficient Homes	Policy HOU 1	<p>To be effective, Policy HOU1 and the supporting text should clearly justify and set a 'housing requirement' rather than a 'housing target'.</p> <p>The 'housing requirement' set out in Policy HOU1 should not be 9,600 homes as proposed but should be at least 10,620 homes.</p> <p>Against a requirement of 10,620 homes a buffer of at least 10% (i.e. sites sufficient for 11,682 homes) and ideally 20% (i.e. sites sufficient for 12,744 homes) should be identified to ensure a robust supply of housing land.</p> <p>This would require the identification of additional sites capable of accommodating between 1,083 and 2,145 homes, although as we set out in our representations to Policies F01/B and NW62/A, in Section 3, there is also the likely need to identify sites for a further 920 homes.</p>	<p>The Local Plan aims to deliver the quantity of homes necessary to meet the assessed needs of the District. The Authority has carefully considered both the need for, and the delivery of new, homes.</p> <p>Conclusion No change proposed</p>	No	N/A
PCO/?	North Norfolk District Council	7.1 Delivering Sufficient Homes	Policy HOU1	Table headings in HOU1 should make clear that dwelling totals in fifth column exclude elderly persons accommodation.	Conclusion Agreed, make modification.	Yes	PMIN/??
LPS154	Mr Michael Rayner (CPRE Norfolk)	7.1 Delivering Sufficient Homes	Section 7	<p>Supports approach to setting housing requirement and its inclusion of expected windfalls as explained at 7.1.7, although the inclusion of the latter at approximately 50% of the historic rates is considered to be too low. A higher percentage inclusion of windfalls would allow for a lower number of new allocated housing, with the subsequent beneficial effect of more new housing being located in more sustainable locations, e.g. windfalls more likely to be small-scale infills, redevelopments, re-use of existing buildings and affordable dwellings in the designated Countryside Policy Area.</p> <p>Policy HOU 1 should include a higher % of windfalls than the current windfall allowance of around 50% of the historic rate.</p>	<p>Support noted. The Council does not consider the policy needs to be altered. The Council has been realistic in reducing its expectations in relation to future windfall housing to a figure which equates to around 50% of the historic rate and has carefully assessed the likely future supply of development derived in this way. Increasing windfall rates and reducing allocations would risk undermining certainty of delivery.</p> <p>Conclusion No change proposed.</p>	No	N/A
LPS420	Sarah Peters (ABZAG Ltd)	7.1 Delivering Sufficient Homes	Section 7.1	<p>Homes in the District used as second homes is shown as 8-10%.</p> <p>On what basis is this percentage being used, where is the evidence to support this?</p> <p>A higher percentage of second homes needs to be taken into account in the OAN.</p>	The percentage of second homes in the District is based on evidence taken from council tax records and validated from Census information. This figure relates to the entire District but the Plan acknowledges that percentages are much higher in some communities. The Council has considered the existing and potential numbers of second homes when setting the housing target in the Plan and is satisfied that the correct numbers and evidence has been used.	No	N/A

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				<p>In a number of the identified allocations the percentage of second homes already out strips this percentage (over 40% in some) and is likely to increase further. Therefore, the new homes built are not going to fulfil the OAN but instead cause further migration to the District as more second home owners are attracted.</p> <p>Use the correct population numbers and estimates. Then calculate the correct OAN for housing numbers.</p>	<p>The standard national methodology for establishing OAN (and the variation used by the Authority) already includes a very significant 'affordability' uplift which results in an OAN well above that justified by projected population growth alone. No further uplifts are required by the methodology and such additional uplifts are not justified.</p> <p>The Council does not consider the policy needs to be altered.</p> <p>Conclusion No change proposed</p>		
LPS287	Miss Donna Clarke	7.1 Delivering Sufficient Homes	Section 7.1	<p>It is not clear to me why Briston and Melton Constable are considered growth villages. Melton Constable lacks infrastructure and available land whereas Briston does not.</p> <p>No further housing development should be allocated in Melton Constable for this reason and because it is a Conservation Area.</p>	<p>The two communities are very closely related with a good range of services conveniently accessible to residents of both villages. Melton has a shop, takeaways, doctors surgery and community facilities and the Primary School is easily accessible to both communities. The distribution of growth strategy recognises this and would allow for growth in either settlement if suitable sites could be identified. However, there are no allocations proposed in Melton Constable reflecting the absence of suitable sites but small-scale infill developments within the defined development boundary would represent a sustainable type of development and would be supported. The status of Melton as a Conservation Area is recognised and addressed in other policies of the Plan.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS420	Sarah Peters (ABZAG Ltd)	7.1 Delivering Sufficient Homes	Section 7.1	<p>Inconsistency in base data used, therefore, unlikely calculations are correct and no confidence in outcomes.</p> <p>Paragraph 2.1.2. has the then 2016 resident population as 103,587 and the ONS predicted population for North Norfolk as 112,078 by 2036, while paragraph 7.1.1 has the population growth through the Plan Period of 7,781 and then incorrectly states that the population will be only 108,893 which is c3,000 understating the projections in 2.1.2. and 7.1.1.</p> <ul style="list-style-type: none"> • Paragraph 2.1.2. has the population of North Norfolk by 2036 as 112,078 • Paragraph 7.1.1. has 103,587 + 7,781 = 111,368 <p>Both these numbers are significantly higher than the 108,693 quoted in paragraph 7.1.1.</p> <p>Use the correct population numbers and estimates. Then calculate the correct OAN for housing numbers.</p>	<p>Para 7.1.1 quotes incorrect population projections and should be corrected to quote figures used elsewhere in the Plan. Figures used by the Authority in the Housing Needs calculation are correct.</p> <p>Change para 7.1.1 to ensure consistent (correct) population projections are quoted.</p> <p>Conclusion Agree to requested modification (part)</p>	Yes	PMIN/7.1/01
LPS324 LPS389	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP) David Jones, Armstrong Rigg	7.2 Delivering the Right Mix of Homes	HOU 2	<p>Proposed Amendments The table under policy HOU2 is considered confusing and lacking in clear information, as summarised below:</p> <p>1. The heading to the second column specifies that 'a minimum should be provided as First Homes'. Yet does not</p>	<p>1. Para 7.2.1 sets out that the provision of First Homes for purchase at discounted rates is the Government's preferred tenure for low cost ownership and at least 25% of affordable homes should be provided in this way.</p>	Yes	PMIN/HOU2/02

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	Planning (D L Ritchie Will Trust)			<p>specify what that minimum figure is. The 25% figure being provided under the Required Affordable Housing Mix column.</p> <p>2. Under the second column for schemes of 6-25 dwellings the table identifies an option of making the affordable homes provision, via financial contribution. The policy itself or supporting paragraphs provide no assistance in explaining how this is to be calculated nor does it refer to other guidance where this will be made clear.</p> <p>3. For sites of 26 dwellings and over the table indicates that provision of affordable homes are to be delivered via developer contribution. This could be interpreted as referring to a financial contribution, which is not perceived to be the intention, is unnecessary and should be omitted.</p> <p>4. The policy should cater for circumstances where viability makes the delivery of the policy required level of affordable housing not possible. Wording should be introduced to the policy that in such circumstances proposals will be the subject of a viability appraisal to be provided by the applicant and subject of independent assessment on behalf of the Council.</p> <p>5. Required market housing mix column for schemes of 6 dwellings and larger it should be made clear that 'of the' minimum 50% two or three bed properties, approximately 20% of these should be two bed and approximately 80% three bed.</p>	<p>Propose modification for clarity, add 25% figure to column heading.</p> <p>2. Para 7.2.6 requires such contributions to be an equivalent financial contribution of sufficient value to deliver the affordable homes requirement elsewhere. This figure is likely to vary over time and by location so will need to be determined at application stage.</p> <p>No change proposed</p> <p>3. Propose modification for clarity amend wording to say 'delivered by the developer' and delete the word 'contribution'?</p> <p>4. Viability matters are set out clearly in Policy HC 4. The Plan adequately provides for those circumstances where viability considerations might make policy compliance difficult.</p> <p>No change proposed</p> <p>5. Policy states this clearly, no modification required.</p> <p>Conclusion Modifications are proposed in part for clarity.</p>	No	N/A
						Yes	PMIN/HOU2/03
						No	N/A
						No	N/A
LPS652	Mr Lyndon Swift (Weybourne Parish Council)	7.2 Delivering the Right Mix of Homes	Para 7.2.1	<p>The definition of "affordable housing" needs to be amended to make it genuinely affordable to local families. There needs to be a focus on the development of social housing to meet the needs of the most disadvantaged in society. By putting restrictions on the use of housing so that it is available only as a primary residence would have the effect of making more houses available to lower income families, and generally lower the price of housing, which would no longer be subject to the inflating effect of people moving from more expensive regions, and therefore being prepared to pay high prices to obtain a house in North Norfolk.</p>	<p>Comments noted. The definition of 'affordable homes' aligns with national policy. The delivery of affordable homes is a key priority for the Council. This policy sets a general requirement for on-site affordable housing provision based on local evidence.</p> <p>The issue of second homes, principal residency and possible impacts on the housing market and what measures, including how land use planning could be used to influence and mitigate perceived negative impacts has been investigated by the Council. These matters were fully considered at Overview and Scrutiny Committee, July 2022 and set out in the impact of second homes report. The Council supports further legislative changes to enable the retention of increased tax revenue collected by 2nd tier authorities and a request that all second and holiday homes require planning permission.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS774	Mr Mark Behrendt (Home Builders Federation)	7.2 Delivering the Right Mix of Homes	Para 7.2.1	<p>The Council state in paragraph 7.2.1 that at least 10% of the affordable homes should be in affordable home ownership. This statement is not consistent with paragraph 65 of the NPPF which requires at least 10% of homes delivered on major development sites to be available as homes for</p>	<p>Para 7.2.1 accurately states the requirements of the NPPF in relation to affordable home ownership. The Council does not consider it necessary to amend the text as suggested.</p>	No	N/A

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				<p>affordable home ownership. These homes would form part of the overall affordable housing requirement on a site and should be met unless this would exceed the level of affordable housing required in the area or significantly prejudice the ability to meet the affordable housing needs of specific groups.</p> <p>Approach to delivery of dwellings for affordable home ownership is inconsistent with national policy.</p> <p>The Council should therefore amend paragraph 7.2.1 to ensure the local plan is consistent with national policy and provide the necessary clarity to both decision makers and developers as to the required proportion of homes to be provided as set out in the NPPF.</p>	<p>Conclusion No change proposed</p>		
PC051	North Norfolk District Council	7.2 Delivering the Right Mix of Homes	Para 7.2.12	Loose text below para 7.2.12 needs to be joined with that paragraph.	<p>Conclusion Modification proposed for presentational consistency.</p>	Yes	PMIN/7.2/03
PC048	North Norfolk District Council	7.2 Delivering the Right Mix of Homes	Para 7.2.4	Might want to mention that the Broads Authority have regards to/defer to the affordable housing policy.	<p>The Council does not consider it necessary to amend the policy as suggested.</p> <p>Conclusion No change proposed</p>	No	N/A
PC049	North Norfolk District Council	7.2 Delivering the Right Mix of Homes	Para 7.2.5	Might want to reference the next figure that shows the zones.	<p>Add footnote at the end of the first sentence – “See Figure 10 Affordable Housing Zones”.</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/7.2/01
PC050	North Norfolk District Council	7.2 Delivering the Right Mix of Homes	Para 7.2.6	Might want to reference the next figure that shows the rural areas.	<p>Add footnote to the first sentence of para 7.2.6 after “Designated Rural Areas” – “See Figure 11 Designated Rural Area”</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/7.2/02
LPS232 / LPS233 / LPS229 / LPS228	Ms Gabrielle Rowan, Pegasus Group (C & S Norfolk Ltd)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>This Policy provides specific guidance in relation to percentage of affordable housing required and required housing mix. Whilst this level of guidance is welcomed and useful to aide discussions, there needs to be an understanding that flexibility is required in order to ensure the viability of some smaller schemes. A scheme for 6 houses may not be able to deliver the range of different size and tenures required by the Policy as a scheme of 25 houses may be able to accommodate.</p> <p>The feasibility of having one affordable rented property on a scheme of 6 dwellings may not be viable or manageable and may not be the overall intention of this Policy. The number of</p>	<p>The policy sets a general requirement for on-site affordable housing provision of between 15% and 35% on sites of qualifying size determined by site location within two defined Affordable Housing Zones. These are based on local evidence reflecting the viability of delivering housing in the respective parts of the District and the high level of affordable housing need throughout the area. The Council will seek to deliver the highest proportion of affordable homes that is viable and save for very exceptional circumstances will require on site provision at the proportions required by the policy.</p> <p>To address the possible practical problems of providing affordable homes on small sites the policy includes an option to make an equivalent financial contribution of sufficient value to deliver the affordable homes requirement elsewhere.</p>	No	N/A

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				<p>smaller properties required to comply with the Policy may result in small-scale developments being unviable and not providing the level of additional accommodation required as set out in Policy SS1. This may hinder the role of small growth villages in the delivery of this important Policy (SS1).</p> <p>It may be more useful to set guidelines to act as a starting point for discussion within which bespoke housing mix/tenures for each proposal can be negotiated with the LPA.</p> <p>Changes required - It is considered that the following wording is added to the text of Policy HOU2: "Unless the proposal is for a Rural Exceptions Scheme, Gypsy and traveller accommodation, or specialist residential accommodation all new housing developments, including those for the conversion of existing buildings, shall provide for a mix of house sizes and tenures in accordance general conformance with the following:.."</p>	<p>The housing mix requirement is capable of being applied to proposals within the specified number range or site size.</p> <p>Using the term 'general conformance with' lacks clarity and certainty and risks undermining the effectiveness of the policy.</p> <p>The Council does not consider it necessary or appropriate to amend the policy as requested.</p> <p>Conclusion No change proposed</p>		
PC052	N North Norfolk District Council	7.2 Delivering the Right Mix of Homes	Policy HOU 2	Table notes 4 & 5 of the policy refer to the wrong number figures. Figure 11 should be 10 and Figure 12 should be 11.	Conclusion A modification is proposed for reasons of correction / clarification	Yes	PMIN/HOU2/01
LPS450 LPS448 LPS409	Mr Jake Lambert, Bidwells (Hopkins Homes) Sarah Hornbrook, Bidwells LLP (ESCO Developments, Flagship Housing Group & Lovell Partnerships)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>This policy requirement is not justified by evidence, with the Strategic Housing Market Assessment (2019) and Housing Stock Modelling Report (2021) explicitly excluding care provision from its assessment of housing need.</p> <p>Reference to the on-site delivery of care provision in HOU2 should be deleted, and a separate development management policy formed to support proposals for care accommodation.</p>	<p>The policy supports the provision of housing to meet the specific needs of older people and is justified by evidence including that set out in Norfolk County Council's Living Well Strategy 2019.</p> <p>A development management policy which merely supports proposals for care provision rather than site-specific obligations to actually provide accommodation would not represent a positive strategy to deliver this type of accommodation or deliver mixed and inclusive communities.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS450 LPS448 LPS409 LPS492	Mr Jake Lambert, Bidwells (Hopkins Homes) Sarah Hornbrook, Bidwells LLP (ESCO Developments, Flagship Housing Group & Lovell Partnerships) Mr Mark Singer, Barton Willmore (Sutherland Homes)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>The '% Affordable Homes Required' element of Policy HOU2 should be embellished to recognise that delivery of the specified affordable housing percentages is subject to scheme viability.</p> <p>Consider that not all the costs faced by developers have been included in the viability assessment. No new evidence on affordable housing needs has been produced since 2017 nor any assessment as to whether the 2017 SHMA remains consistent with the approach to assessing affordable housing needs set out in paragraphs in 2a-018 to 2a-024 of Planning Practice Guidance, which was updated in 2019.</p>	<p>The plan provides for affordable housing in line with national policy. The requirements are based on local evidence that reflects the viability of delivering housing in the respective parts of the District and the high level of need throughout the area.</p> <p>Affordability indicators have not improved in recent years and there remains a very high unmet need for affordable homes.</p> <p>Approach to viability assessment is covered in Policy HC4</p> <p>Conclusion No change proposed</p>	No	N/A

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LPS773	Mr Mark Behrendt (Home Builders Federation)			In order to ensure the policy is justified the Council should ensure that it has an up-to-date evidence base as to the need for affordable housing in the Borough.			
LPS305 LPS304	Mr Sam Hazell, Lawson Planning Partnership Ltd (White Lodge Norwich Ltd)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>OBJECT to Policy HOU2 and the specified mix for sites of 6-25 dwellings, which when applied to sites in Small Growth Villages is not based on proportional evidence and is therefore not justified.</p> <p>Furthermore, the assumptions around developer profit were made when the proposed approach was for sites in Small Growth Villages to be allocated through Part 2 of the Plan. The current approach to consider proposals for housing development in smaller villages by way of their position relative to the defined settlement boundary along with the criteria set out in the policy provides a reduced level of certainty for landowners/ developers, for which a greater profit may be required to offset risk and to encourage sites to come forward, as set out in detail in the representations letter dated 1st March 2022, attached.</p> <p>To make the Plan sound, a separate viability assessment which is proportionate and necessary should be undertaken to examine the policy interaction on small sites in Small Growth Villages.</p>	<p>The Local Plan is supported by an up to date and proportional viability study including for smaller scale village locations.</p> <p>No specific modifications have been suggested and no modifications are required.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS354 LPS375	Mr Alan Presslee, Cornerstone Planning Ltd (Norfolk Homes) Mr Alan Presslee, Cornerstone Planning (Sheringham House Holdings)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>The policy is far too detailed and cannot be justified. To specify that all sites and all development over 6 dwellings should have such a specific mix is unnecessarily prescriptive and inflexible.</p> <p>Consider that the Council's 25% level of affordable housing, 'housing incentive scheme' – which proved so effective in securing early delivery of housing (both market and affordable) - should be maintained in Zone 2 through the new Local Plan, as this better reflects the viability position.</p> <p>It is worth considering the proposed North Norfolk Policy HOU2 against Policy 5 (Homes) of the recently submitted Greater Norwich Local Plan. That policy says: "Residential proposals should address the need for homes for all sectors of the community having regard to the latest housing evidence, including a variety of homes in terms of tenure and cost."</p>	<p>The mix of homes provided in terms of sizes and tenures has been carefully considered and provides clarity in terms of expectations. There are no reasons why smaller schemes of between 6 and 25 dwellings should not provide for a range of dwelling sizes required by the Policy. The option of a financial contribution for affordable homes is included in this size of proposal to reflect possible practical problems with providing on site provision.</p> <p>The Council does not consider that the policy needs be modified in this way.</p> <p>The Local Plan is supported by an up to date and proportional viability study which supports 35% affordable housing provision in zone 2.</p> <p>Conclusion No change proposed</p>	No	N/A

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				Such an approach is entirely appropriate and should be reflected in North Norfolk's Plan.			
LPS467	Mr Jake Lambert, Bidwells (Broadland Housing Association)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>The definition of affordable housing within the Glossary of the draft Local Plan is comprehensive. To ensure consistency with this definition, and to remove any ambiguity from Policy HOU2, footnote 6 of the policy should be amended to acknowledge that shared ownership products are included in the 'Rented' criterion. To achieve this, the following amendment is suggested:</p> <p>1 'Rented' includes Social Rent, Affordable rent, Shared Ownership and Intermediate Rented products subject to affordability criteria.</p>	<p>The Council does not consider that the policy needs be modified in this way. The glossary and NPPF definition include 'shared ownership' under 'other affordable routes to home ownership' rather than 'affordable housing for rent'.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS467	Mr Jake Lambert, Bidwells (Broadland Housing Association)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>The second column of the table within Policy HOU2 also requires amendment to ensure clarity. As written, the second column sets out the thresholds for delivery of '% Affordable Homes Required of which a minimum should be provided as First Homes'. This wording is ambiguous and contrary to the Local Plan Glossary definition of affordable housing, which excludes First Homes from the definition. It should be amended to clearly identify the required delivery of First Homes as part of a development's affordable housing mix.</p>	<p>The Council does not consider that the policy needs be modified in this way. First Homes are included in the Plan's definition of affordable housing under 'discounted market sale housing'. The pre-ambule to the policy sets out that at least 25% of affordable homes should be First Homes.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS542	Mr Alastair Curran, Planning places Ltd (FW Properties Ltd)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>The policy is open to interpretation, without clear guidance on how 'rural exception schemes, Gypsy and Traveller accommodation, or specialist residential accommodation' will be supported. The policy excludes these accommodation types from delivery on larger sites but does not offer support or direction regarding where such proposals would fit within the wider Spatial Strategy or in which locations individual applications would be supported. It is considered for the proposed plan to be more justified, a clearer strategy, or clearer support for these uses is required within the policy wording.</p> <p>The policy does not provide sufficient flexibility for elderly care accommodation to be incorporated in more rural locations, or in areas of the district which are not proposing large site allocations. A plan-led system should facilitate a suitable strategy for combating need, such as providing sufficient elderly care accommodation to meet the identified need.</p>	<p>The Council does not consider that the policy needs be modified in this way. The specialist accommodation needs of the Gypsy and Traveller community and those of essential rural workers are addressed separately in Policies HOU 5 and HOU 4, respectively. The plan provides flexibility for the provision of specialist elderly persons accommodation including within the designated countryside under Policy SS 2.</p> <p>Conclusion No change proposed</p>	No	N/A

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				<p>HOU2, in combination with HOU1, places a great reliance on large scale windfall development or brownfield land to be redeveloped to deliver elderly care accommodation. Instead, it is considered that more land should be allocated across the district to facilitate elderly accommodation. For example, allocation HV01/B in Hoveton is allocated for elderly care accommodation, however policy HOU2 would require 0 units, and the allocation policy requires 60 units, however the expanded site would be able to deliver 70+, alongside dedicated open space and other design features to ensure a cohesive and quality development. It is considered that to make the plan more positively prepared and justified, the existing allocation should be looked at to deliver more elderly care accommodation, whilst support for development adjacent to settlement boundaries for elderly care accommodation in locations which do not have allocations, should be considered.</p> <p>It is considered that to make the plan more positively prepared and justified, the existing allocations should be looked at to deliver more elderly care accommodation (such as HV01/B), whilst support for development adjacent to settlement boundaries for elderly care accommodation in locations which do not have allocations, should be considered.</p>			
LPS536	Mr Alastair Curran, Planning Places Ltd (Ilex Homes)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>Custom/self-builders have a preference of where they wish to live. This does not typically result in requests for sites on large housing estates. Equally, those building out large housing estates do not wish to provide self/custom build plots as it has the potential to detrimentally impact the delivery of sites, such as with multiple contractors working simultaneously, or development occurring outside of a phased plan.</p> <p>Policy HOU2 should remove the requirement that large sites provide self-build plots and instead, support should be provided for the provision of speculative plots in sustainable locations, such as adjacent to or connected to existing settlements.</p>	<p>There is a modest need for self-build plots in the District. These needs should be met in sustainable locations. The requirement to provide serviced plots on allocated sites is reasonable.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS775	Mr Mark Behrendt (Home Builders Federation)			<p>There is no justification to support the Council's policy that 2% of all homes delivered on sites over 25 dwellings should be self-build given that the Council has only 14 individuals on its self-build register. It is also important to note that the list expresses an interest in building their own home and not necessarily the ability to actually finance such a project. Whilst we recognise that PPG sets out that other evidence of demand should be considered the evidence from the self-build register does not give any indication that there is significant demand for such plots in North Norfolk. It will also be important that the Council establish how many such</p>			

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				<p>homes they expect to deliver through such a policy if they are to justify its inclusion. Given wide number of sites that could potentially be affected by this policy and the low level of demand there is a significant risk that supply will exceed demand.</p> <p>Without the necessary evidence the policy cannot be justified and as such should be deleted. If further evidence of demand is established and the policy is considered to be sound, then provision should be made in the policy for unsold plots to return to the developer. Such provisions are necessary to ensure plots for much needed homes are built out and not left empty to the detriment of the other residents in</p>			
LPS492	Mr Mark Singer, Barton Willmore (Sutherland Homes)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>We consider it essential that the policy is flexible in its ability to respond to changing circumstances and market trends over the plan period.</p> <p>There should be an inclusion within the policy text or a footnote on the table to specify that housing mix is to be informed by the requirements of the policy but to be determined on case by case basis in accordance with local needs evidence. This would reflect footnote 1 in relation to Affordable Housing Mix.</p>	<p>The Council does not consider that the policy needs be modified in this way. The Local Plan is supported by an up to date and proportional viability study. Determining housing mix on a case-by-case basis lacks certainty and risks undermining delivery.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS492	Mr Mark Singer, Barton Willmore (Sutherland Homes)	7.2 Delivering the Right Mix of Homes	Policy HOU 2	<p>Our client's site is classified as '26-150 or sites larger than 4 hectares'. It is located in Affordable Zone 2, and as such, at least 35% on site provision of affordable housing must be provided. We also note this includes 'Extra Care, Sheltered Housing, Assisted Living, Dementia Care, and Nursing and Care Homes where there is demonstrated to be a local need at time of application'.</p> <p>It is not clear from the Viability Assessment that this has been tested and is demonstrably deliverable, as it only appears to assess C3 sheltered and C2 Extra Care accommodation. Specialist care homes have entirely different characteristics and may result in different conclusions around viability. This should be assessed now or deleted from the requirement for affordable housing.</p> <p>To ensure the policy is justified the Viability Assessment should be updated to assess whether specialist care homes can support the affordable housing requirement. Further work should also be carried out to demonstrate that the affordable housing target of 35% is deliverable.</p>	<p>The Council does not consider that the policy needs be modified in this way. The Local Plan is supported by an up to date and proportional viability study.</p> <p>The circumstances where viability can be considered are adequately addressed in Policy HC5.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS782	Mr Ziyad Thomas, Planning Issues Ltd (Churchill Retirement Living & McCarthy Stone)						

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				<p>The North Norfolk District Council Interim Plan Wide Viability Assessment (2021) does not provide a credible basis for the affordable housing rates across the Authority for specialist older persons' housing.</p> <p>The evidence we have provided in our viability appraisals for Sheltered Housing and Extra Care Housing typologies, concludes that these forms of development cannot support the level of affordable housing and CIL being proposed in the emerging planning obligations regime.</p> <p>The affordable housing target of 15% and 40% for specialist older persons' housing typologies detailed in Policy HOU2. Delivering the Right Mix of Homes would prejudice the delivery of these forms of development over the Plan period.</p> <p>This is a critical issue as North Norfolk has one of the highest proportions of older people in the Country and is required to deliver 2,341 units of specialist older persons' housing over the Local Plan period. The adoption of affordable housing targets which undermine the viability and substantially impede the delivery of these, much needed, forms of development.</p>			
PC053	North Norfolk District Council	7.3 Affordable homes in the countryside	Para 7.3.2	End of sentence 2, incomplete word. 'Any excessive development costs associated with the develop'.	Conclusion Modification proposed to correct typographical error	Yes	PMIN/7.3/01
LPS119	Mr Callum Ringer	7.3 Affordable homes in the countryside	Para 7.3.2	Considers that the plan does not go far enough in ensuring that all homes built within exceptions sites are for local benefit. Considers that any open market homes built as part of an exceptions site must be sold only to people with a local connection and planning conditions or other mechanisms should be used to ensure they are only used as principal homes in perpetuity.	<p>The policy approach aligns with the NPPF which allows for some market homes to be included within exceptions schemes, provided that the value of the market homes is used to fund the delivery of additional affordable homes. It is considered that any attempt to impose other restrictions on such market homes would negate the purpose of the provision and would be contrary to the aims of the NPPF.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS137	Mrs Gemma Harrison (Holt Town Council)	7.3 Affordable homes in the countryside	Policy HOU 3	Holt Town Council support the idea of policy 1 and 2, however, Cllrs feel affordable housing isn't always affordable and as such social housing provision needs to be increased in the town of Holt.	<p>Affordability is set via national policy and grant availability and is capped at Local Housing Allowance. Other purchase products are discounted below local open market values.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS391	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	7.3 Affordable homes in the countryside	Policy HOU 3	Our client broadly supports the provisions contained in this policy, but objects to its failure to mention entry-level exception sites and First Homes exception sites. In addition to rural exception sites, the NPPF supports the provision of entry-level exception sites at paragraph 72 and the PPG (ID: 70-024 to 029) supports First Homes exception sites.	<p>Much of the district is 'a designated rural area' under Section 157 of the Housing Act 1985 or by virtue of being designated as an Area of Outstanding Natural Beauty. Whilst First Homes can come forward on unallocated land outside of a development plan they cannot come forward in designated rural areas as defined in Annex 2 of the NPPF. In these areas rural exceptions sites are the sole permissible type of exception site.</p> <p>Conclusion</p>	No	N/A

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				<p>Recommendation: In order to accord with national policy and therefore be considered sound, the policy should be amended as follows:</p> <p>“Policy HOU 3</p> <p>Affordable Homes in the Countryside (Rural Exceptions Housing)</p> <p>3. The Council will also support the delivery of First Homes exception sites and entry-level exception sites in accordance with national policy.</p>	No change proposed		
PC054	North Norfolk District Council	7.4 Essential Rural Worker Accommodation	Para 7.4.1	<p>Para says, “The construction of new dwellings in the countryside to meet these needs will, in exceptional circumstances, need to be justified in line with the policy requirements.”</p> <p>As written, this means that “in exceptional circumstances, it needs to be justified”. If what is meant is that “the construction of new dwellings in the countryside, to meet these needs, will only be allowed in exceptional circumstances and will need to be justified in line with the policy requirements” then the wording should be changed as stated.</p>	<p>The distinction raised is correct, delete words ‘in exceptional circumstances’ from the text. The policy clearly explains the criteria to be complied with.</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/7.4/01
LPS489	Sarah Peters (ABZAG Ltd)	7.5 Gypsy, Traveller & Travelling Showpeople's Accommodation	7.5	<p>Section 7.5 Gypsy, Traveller & Travelling Showpeople’s Accommodation fails to set out the OAN for this requirement through the Plan Period or what the future need is. Just stating in 7.5.4. that current pitches are sufficient is not good enough. It is not sound as it is not effective; not justified, and not consistent with national policy</p> <p>Proposed change Provide evidence. Allocate specific sites for Gypsy, Traveller & Travelling Showpeople’s accommodation.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The policy approach is supported by the Norfolk wide Gypsy & Traveller, and Caravan Needs Assessment undertaken across the region jointly by the LPA’s through the Norfolk Strategic Forum and Duty to Co-operate process. The level of addition need up to 2036 is low, mainly derived from existing family growth , only the need for 8 additional residential pitches at varying times during the Plan period is identified which does not support further allocations</p> <p>More information on the level of need can be found in the published study.</p> <p>Conclusion No Change proposed</p> <p>Are we happy with me quoting the need could just remove this and signpost to the evidence</p>	No	N/A
LPS344	Miss Natalie Beal (Broads Authority)	7.5 Gypsy, Traveller & Travelling Showpeople's Accommodation	Policy HOU5	<p>Given that there is potential for Gypsy and Traveller and Travelling Showpeople accommodation to be away from settlements, we do not think that ‘minimises impacts’ is adequate. Our equivalent wording says ‘The site will not harm the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape’. By saying ‘minimises’, this implies some impact is acceptable.</p> <p>Relevant part of NPPF</p>	<p>The Council does not consider it necessary to amend the policy as requested. The policy matters raised are covered in other specific policies in the Plan. Proposals will be assessed against the Local Plan and development framework as a whole.</p> <p>Conclusion No Change proposed</p>	No	N/A

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				The Broads and the setting of the Broads is protected at NPPF paragraph 176. Proposed change b. development minimises impact on the surrounding landscape ; the site will not harm the setting of any heritage asset or any adverse impact on the character and appearance of the surrounding landscape.			
LPS653	Mr Lyndon Swift (Weybourne Parish Council)	7.6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Para 7.6.1	The Plan needs to provide a definition of what is “excessive development”, and this should be achieved by listening to local representatives, who have a much better understanding of the impact of overdevelopment than a planning officer for whom it is merely an exercise on paper.	The definition of ‘excessively’ could be considered subjective, however, Policy HOU 6 provides several criteria by which to judge a proposal. Further, the North Norfolk Design Guide, with which such proposal will be required to comply with, includes detailed requirements to be met. In addition, local representatives will continue to have the opportunity to comment on individual proposals at the time of application. Conclusion No change proposed	No	N/A
LPS654	Mr Lyndon Swift (Weybourne Parish Council)	7.6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Para 7.6.3	7.6.3 Proposals in Conservation Areas and those affecting Listed Buildings must also comply with the approach and all proposals should ensure no unacceptable impacts on the amenities of adjacent occupants in accordance with Policy ENV 6 'Protection of Amenity'. This does not meet the “Effective” test of soundness. Unless it is explicitly stated that this applies not just for the development but for the lifetime of the development and even beyond. Modify the wording to state that these restrictions should apply in perpetuity.	The Council does not consider that the policy needs be modified in this way. Any potential future issues in relation to amenity would be considered and addressed during the application process. Conclusion No change proposed	No	N/A
LPS106	Dr Victoria Holliday	7.6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Policy HOU 6	Point 1 a and 2- material increase in impact - can this be quantified or otherwise made objective? it sounds subjective and open to interpretation. Can there be reference here to an existing and proposed footprint and that proposals should include the % change?	It is not considered that the policy needs be modified in this way. Aspects of design and their ‘impacts’ inherently involve elements of judgement. Policy HOU 6 provides clear criteria against which judgements can be made having regard to the proposal and it’s setting without being prescriptive. For example, a three storey building covering much of a plot may be acceptable in the centre of Cromer but is unlikely to be acceptable elsewhere. Further, the North Norfolk Design Guide, with which such proposals will be required to comply with, includes other detailed requirements to be met. Footprint of the development is referred to in the policy as ‘plot coverage’. Specific reference to percent change proposed is not considered necessary. Conclusion No change proposed	No	N/A
LPS199	Miss Donna Clarke	7.6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Policy HOU 6	The policy takes no account of permitted development rights. Any question of material impact should take into consideration what is allowed as permitted development.	The Policy does not need to require consideration of permitted development rights, as a planning application, by its nature, indicates that planning permission is required. Individual applications would be able to seek justification for the scale of a proposal by providing comparison with what could be allowed	No	N/A

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					<p>under permitted development rights if the applicant considered this relevant.</p> <p>Conclusion No change proposed</p>		
LPS655	Mr Lyndon Swift (Weybourne Parish Council)	7.6 Replacement Dwellings, Extensions, Domestic Outbuildings & Annexed Accommodation	Policy HOU 6	<p>1. In determining what constitutes a 'material increase in impact' account will be taken of the size of the proposal in relation to the prevailing character of the area, the size of the existing property, the prominence of the site, plot coverage, and impact of the proposal on the landscape and townscape of the area.</p> <p>This does not meet the "Effective" test of soundness.</p> <p>It is not clear what "account will be taken of" actually means.</p> <p>The Plan needs to state explicitly what is acceptable and under what circumstances.</p>	<p>The Council does not consider that the policy needs be modified in this way. To 'take something into account' is a commonly used phrase that means you consider it when you are thinking about a situation or deciding what to do. As circumstances will vary widely from one site to another it would not be appropriate to include prescriptive standards in the way suggested. What constitutes a material increase in impact will be determined by the specifics of each application judged against the criteria identified.</p> <p>Conclusion No change proposed</p>	No	N/A
PC058	North Norfolk District Council	7.7 Re-Use of Rural Buildings in the Countryside	Policy HOU 7	<p>What about someone who erects a building that is permissible in the area and that new building makes another one redundant and then they use this policy?</p>	<p>The Council considers that the policy operates effectively for such a situation.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS107	Dr Victoria Holliday	7.7 Re-Use of Rural Buildings in the Countryside	Policy HOU 7	<p>Does this policy apply to all designated countryside, conservation areas, AONB etc?</p> <p>There should be additional protection for such areas when considering reuse of rural buildings? eg for Proposals falling in designated countryside, conservations areas, protected landscapes and the AONB, the benefits must outweigh the harms.</p>	<p>The policy applies to all proposals of this type in all locations within the designated countryside including Conservation Areas and AONBs. In addition to compliance with this policy, proposals are required to comply with all other relevant policies, including those that are specific to proposals within other designated / protected areas. The Council is satisfied that any additional protection for such areas, when considering the reuse of rural buildings, is adequately provided for elsewhere in the Plan. For example, a building conversion in a Conservation Area would need to comply both with Policy HOU7 and also meet the requirements of Policy ENV7 –Protecting and Enhancing the Historic Environment.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS200	Miss Donna Clarke	7.7 Re-Use of Rural Buildings in the Countryside	Policy HOU 7	<p>Many of these buildings have structural issues and if they can be repaired, they should be. For example, replacement of a structural timber in a barn is quite common.</p> <p>Criterion b should be amended to "a substantial proportion of the structural elements", not all.</p>	<p>The policy needs to safeguard against wholesale rebuilding and ensure that proposals are for conversion, but it is accepted that this can be achieved via the retention of a 'substantial' proportion of structural elements.</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/HOU7/02
LPS601	Mr Phillip Atkinson, Lanpro Services (Mr Daniel Broch)	7.7 Re-Use of Rural Buildings in the Countryside	Policy HOU 7	<p>Mr D Broch owns a disused storage building off the A149 at Blakeney that is structurally sound and no longer required for storage purposes. The former storage building is suitable for conversion to form a market affordable dwelling.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The criteria identified within the policy are intended to ensure that buildings are converted (not rebuilt) and meet the objectives of the Framework when taken as a whole.</p>	No	N/A

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LPS527	Mr Phillip Atkinson, Lanpro (Mr John Bonham)			<p>The building to be converted is on the edge of the village of Blakeney that is defined as a Large Growth Village under Policy HOU1 of the emerging Local Plan. The building is some 120m or a 2-minute walk time from the existing settlement boundary for Blakeney. It is well related to existing shops and services within the village. The proposal is subject to an outstanding planning appeal (PINS reference APP/Y2620/W/21/3267614 [DISMISSED]) and a current planning application that is not yet determined by North Norfolk District Council (NNDC reference PF/21/1524 [still pending 30/11/22]).</p> <p>My client considers that emerging Policy HOU7 as currently worded is UNSOUND as it is not positively prepared and not consistent with the tests contained in paragraph 80(c) of the National Planning Policy Framework (NPPF). Policy HOU7 is not justified as currently worded. National planning policy contained in paragraph 80(c) of the NPPF allows development in the countryside where it would re-use a redundant or disused building(s) and where it would enhance the immediate setting of the building to be converted.</p> <p>Paragraph 80(c) of the NPPF does not require confirmation of a building's structural soundness; the retention of the majority of the building's fabric; the preservation of the building's character regardless of its location; the preservation of the building's external appearance or its setting; the building to be ancient or more than 10-years old; or full compliance with the requirements of the North Norfolk Design Guide in any conversion. The NPPF only requires that the building to be converted is disused and the setting is enhanced under any proposal.</p> <p>Seek amendments to the wording of Policy HOU7 to make it sound. This specifically includes the removal of the 'extra' criteria introduced into the current wording to ensure that the emerging Policy is positive prepared and enables (rather than precludes) rural housing delivery. This is to ensure a greater level of consistency with the NPPF.</p>	<p>Conclusion No change proposed</p>		
PC056	North Norfolk District Council	7.7 Re-Use of Rural Buildings in the Countryside	Policy HOU7 Criterion a-e	Are these 'and' or 'or'? Might want to clarify.	<p>The Council does not consider that the policy needs be modified in this way. The policy clearly requires 'all' criteria to be met.</p> <p>Conclusion No change proposed</p>	No	N/A
PC057	North Norfolk District Council	7.7 Re-Use of Rural Buildings in the Countryside	Policy HOU7 Criterion a-e	The policy criteria are not in numeric format. This is inconsistent with other policies.	<p>Amend the text in the manner suggested.</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/HOU7/01
PC061	North Norfolk District Council	7.8 Accessible & Adaptable Homes	7.8.11	Phrasing issue: 'with the requirements Council's Developer Contribution and viability policy...	Modification is proposed for reasons of clarity	Yes	PMIN/7.8/03

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				Change to: 'characteristics of the site and, in line with the requirements of Policy HC 4 Infrastructure Provision, Developer Contributions & Viability, provide robust, transparent...'	Conclusion Agree to suggested modification		
PC062	North Norfolk District Council	7.8 Accessible & Adaptable Homes	7.8.12	Phrasing issue: 'This should not left to the interrogation of designs and drawings' Change to: 'This should not be left to the interrogation of designs and drawings'	Modification is proposed for reasons of clarity Conclusion Agree to suggested modification		PMIN/7.8/04
PC059/ PC060	North Norfolk District Council	7.8 Accessible & Adaptable Homes	7.8.5	Phrasing issue: '...well laid out, <u>practice</u> to live in, and contain...'. 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. Change to: '...well laid out, practical to live in, and contain..... and attract working age population means dwellings need to be functional and adaptable across'	Modifications is proposed for reasons of clarity Conclusion Agree to suggested modification(s)	Yes	PMIN/7.8/02
LPS288	Mr Mamun Madaser (Habinteg Housing Association)	7.8 Accessible & Adaptable Homes	Policy HOU8	Policy HOU 8 requires 5% of dwellings on sites of 20 units or more meet Building regulations M4(3) Standard M4(3) Standard: Category 3. Habinteg recommends that 10% of new homes comply with Part M4 (3) Standard (wheelchair accessible). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of wheelchair ready (Part M4(3) homes should be considered as a starting point for all local plans, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.	Comments noted. Habinteg views are based on national data. The policy approach recognises that there is an unmet need in both market and affordable and applies the requirement across all types of dwellings. In doing so it seeks to meet the identified need in North Norfolk. More information can be found in in background paper 7 Housing Construction Standards. The Council would support further provision Conclusion Agree in part to the modification – for clarification the requirement should be seen as a minimum	yes	PMIN/HOU8/01
LPS356	Mr Allan Presslee, Cornerstone Planning (Norfolk Homes)	7.8 Accessible & Adaptable Homes	Policy HOU8	(Precis only) The approach 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.....Additional work/cost is required by the policy: Paragraph 4 says "All residential development proposals will set out in a Design & Access Statement how each dwelling type complies with or exceeds the M4(2) and M4(3) standards." 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.	The Local Plan sets out the strategic approach that should shape and direct all development across the district and which address the planning authorities strategic priorities. The inclusion of the required information within the application will aid the determination and decision making process. No specific modification is requested or required Conclusion No Change proposed	No	N/A

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				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. 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			
LPS449	Mr Jake Lambert, Bidwells (Hopkins Homes)	7.8 Accessible & Adaptable Homes	Policy HOU8	While Hopkins Homes Ltd are supportive of the delivery of accessible and adaptable homes, the emerging policy requirement to achieve M4(2) compliance across all properties is not considered to be justified by evidence within the Local Plan Evidence Base, thereby causing conflict with Paragraph 35(b) of the NPPF. Also, no analysis has been undertaken as part of the Evidence Base to understand whether the delivery of M4(2) and M4(3) compliant properties in North Norfolk to levels identified in the draft policy is deliverable/viable, thereby raising potential conflict with Paragraph 35(b) of the NPPF. By way of comparison, the emerging Greater Norwich Local Plan seeks to require major housing developments to provide at least 20% of homes to M4(2) standard (Policy 5). This is a more proportionate Approach to the application of M4(2) in practice.	The policy approach recognises that there is an unmet need in both market and affordable and applies the requirement across all types of dwellings. In doing so it seeks to meet the identified need of North Norfolk. The options around this along with the supporting evidence were consulted on at Regulation18 stage. More information can be found in in background paper 7 Housing Construction Standards. The Plan wide viability study utilises an additional cost which has been added to the BCIS build costs rates and reflected in the appraisals. No specific modification is requested or required. Conclusion No Change proposed	No	N/A
LPS410	Sarah Hornbrook, Bidwells (Flagship Housing Group, ESCO Developments & Lovell Partnerships)			It is suggested that the requirement to require all new dwellings to meet Part M4(2) standards should be revisited to ensure the deliverability and effectiveness of the policy, in accordance with Paragraphs 35(b) and (c) of the NPPF, and that the delivery of housing development in the District in the period to 2036 is not delayed by additional layers of viability review to justify a departure from providing 100% M4(2) provision			
LPS776	Mr Mark Behrendt (Home Builders Federation)			At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF for the following reasons: <ul style="list-style-type: none"> Requirements related to the technical standards for accessible homes have not been adequately justified. To conclude whilst the HBF consider that there will be a need for some homes to be built to part M4(2) of the Building Regulations we do not consider the evidence to show that all homes should be built to this standard. It is important that the Council, as required by footnote 49 to paragraph 130 of the NPPF, provides the necessary evidence to show that the need for accessible and adaptable homes justifies this policy			
LPS361	Mr John Fleming (Gladman)			Whilst Gladman are supportive of the Council seeking to include a policy in relation to specialist housing provision in principle, such a policy must be based on appropriate evidence to justify the approach in seeking to apply the higher optional technical standards. In order to demonstrate compliance with the PPG above, the Council will need to provide evidence setting out a specific case for the need for Optional Technical Standards and their application across North Norfolk. Whilst it is accepted that that population of the District is ageing and this trend is accelerating, this is not			

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				in itself a reason to apply the optional building standards to 100% of development proposals			
LPS783	Mr Ziyad Thomas, Planning Issues Ltd (Churchill Retirement Living & McCarthy Stone)	7.8 Accessible & Adaptable Homes	Policy HOU8	We would encourage the LPA to include an appropriate uplift in the build costs in the Local Plan Viability Assessment to reflect the additional cost of 5% of all new dwellings built to Part M4(3).	<p>The Plan wide viability studies includes an upward adjustment for the adaptable and accessible dwelling standards proposed by the Council on the BCIS build costs of between £54sqm and £73sqm depending on the type of residential dwelling. This is broadly in line with the Governments Housing Standards Review cost Impact report by EC Harris commissioned by the Department for Communities and Local Government which advises on anticipated costs associated with the optional standards once a increased sales value is factored in</p> <p>The representation is in relation to the supporting evidence. No specific modification have been suggested and No modifications are required.</p> <p>Conclusion No Change proposed</p>	No	N/A
PC122	North Norfolk District Council	7.9 Minimum Space Standards	7.9.1 7.9.4	<p>7.9.1 Add clarity around circumstances where optional standards may be introduced in line with the PPG and NPPF footnote 49.</p> <p>7.9.4 / Appendix 3. Add additional clarity to the type of information required.</p>	<p>Modification(s) is proposed for reasons of clarity</p> <p>Conclusion Agree to suggested modification</p>	Yes	<p>PMIN/7.9/01</p> <p>PMIN/7.9/02</p> <p>PMIN/7.9/03</p>
LPS469	Mr Jake Lambert, Bidwells (Broadland Housing Association)	7.9 Minimum Space Standards	Policy HOU9	<p>Minimum space standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. BHA delivers housing in accordance with relevant Homes England standards, which are considered appropriate to continue to guide the delivery of housing in the District without requiring compliance with NDSS.</p> <p>BHA wish to suggest deletion of the policy</p>	<p>Comments noted – The options around this along with the supporting evidence were consulted on at Regulation18 stage. More information can be found in in background paper 7, Housing Construction Standards.</p> <p>The representation is in relation to the supporting evidence. No specific modification have been suggested and No modifications are required</p> <p>Conclusion No Change proposed</p>	No	N/A
LPS777	Mr Mark Behrendt (Home Builders Federation)			<p>Minimum space standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do not impact on the viability of development. The application of space standards has been considered in the viability assessment; however, we could not find any evidence on the need for space standards. The Council refer to an ageing population but provides no evidence that homes are coming forward below space standards in order to justify the application of minimum space standards.</p> <p>Requirements related to the technical standards for space standards have not been adequately justified. Given that there is little to suggest that development below space standards is an endemic concern within North Norfolk we</p>			

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LPS361	Mr John Fleming (Gladman)			<p>would suggest that the policy is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.</p> <p>The PPG is clear that the application of NDSS standards can only be implemented where a need for internal space standards is identified and the local planning authority has provided justification for requiring internal space policies taking account of need, viability and timing. It does not appear that this evidence has been prepared and therefore the inclusion of Policy HOU 9 is not justified.</p>			
PC064	North Norfolk District Council	8.1 Employment Land	Para 8.1.4 / Policy E 1	Amend number of hectares referenced in para 8.1.4 and Policy E 1 to ensure correct overall as figure for new allocation in Stalham should be 1.00ha as set out in the allocation Policy ST23/2.	Conclusion Modification proposed for reasons of correction.	Yes	PMIN/E1/01
LPS613	Cllr Nigel Dixon, Ward Member for Hoveton & Tunstead (NNDC)	8.1 Employment Land	Policy E 1	<p>The Plan needs to be modified so that more employment land is allocated to ensure there's sufficient choice of location and space available, with adequate infrastructure capacity, to attract inward investment, business migration and expansion opportunities. Such employment land is mostly found by making mixed residential and employment land allocations either as integral or split sites. Depending on the specifics of the employment sites, infrastructure capacity improvements will need to be identified alongside those allocations to ensure the potential can be realised.</p> <p>The above, proportionate and complementary, modifications are sought to fill obvious gaps and redress imbalances at both strategic and local grass roots levels to ensure the Local Plan is sound and fit for purpose over the next 15+ years. If it's not possible to incorporate these modifications, then please treat these representations as objections.</p>	<p>The Council does not consider that the policy needs be modified in this way. The policy is supported by an up-to-date quantitative and qualitative assessment through the Council's adopted Growth Sites Delivery Strategy 2021 (GSDS). The strategy sets the base line position of available land supply on existing employment for the proposed submission version of 54.06 hectares as detailed in background paper No 3 Approach to Employment.</p> <p>The GSDS recommends the previous land take up scenario is the most appropriate one to base the Local Plan approach on and shows a requirement for 40 hectares during the plan period. The Local Plan provides a further 17.43 hectares through mixed-use allocations while Policy E 3 provides opportunities for businesses situated outside of designated employment areas with the potential to expand and thrive. Thus, delivering choice and flexibility and meeting the identified development and future needs.</p> <p>The options and proposed policies have been collectively discussed and informed through a working party and public consultation.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS531	Mr Alastair Curran, Planning Places Ltd (PSK Building Surveyors Ltd)	8.1 Employment Land	Policy E 1	Specifically for Weybourne Road, Sheringham, employment land area, Kingsland's corporate aspirations are limited by the site, as investment into the facility is cost prohibitive. (Please refer to PSK's letter dated 1 March 2022 which provides budget costs for both refurbishment and redevelopment of the existing building to current industrial design standards.) This, alongside the limited demand and return that a new industrial facility could attract, renders industrial use on the site unviable. As such, there is a risk that the site may become obsolete, and the use lost. In this instance, rewording policy E1 would facilitate new benefits (such as the provision of an easier access to the new leisure centre in the case of Sheringham) whilst also enabling new business to invest locally through more appropriate units (such as office	<p>The Council does not consider that the policy needs be modified in this way. The Council considers that employment areas should be for employment generating uses. The policy requires proposals to comply with Policy E 2 which allows for a range of Use Classes to reflect the level of flexibility set out within the NPPF. Policy E 3 supports employment development outside of designated employment areas.</p> <p>Conclusion No change proposed</p>	No	N/A

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				<p>space which would be better for existing neighbouring residential units' amenity).</p> <p>Therefore, for the Plan to be sound there should be exceptions to the rule of protecting employment land in its current state, such as where it is not financially viable to retain and refurbish.</p> <p>Policy E1 should support the redevelopment of employment land on the condition it is relocated locally and provides better quality buildings, or it should allow enabling development/mixed-use development to replace sites, to ensure the long-term survivability of some form of employment use on site.</p> <p>Expanding the policy through the above recommendations would result in employment land being protected in Sheringham, and elsewhere in the district, where otherwise sites would deteriorate, and new businesses deterred.</p>			
LPS751 / LPS752	Mr Philip Atkinson, Lanpro Services (Glavenhill Strategic Land)	8.1 Employment Land / 8.2 Employment Areas, Enterprise Zones & Former Airbases	Policy E 1 / Policy E 2	<p>Glavenhill is concerned that no new housing or employment growth is proposed to be allocated at Badersfield to support the continued growth and success of the Scottow Enterprise Park (SEP).</p> <p>Emerging Policy E1 confirms that there is no existing space available to develop within the SEP and unlike the two larger employment centres that are the towns of Fakenham and North Walsham no new employment allocations are proposed at the SEP. The SEP is an economic success story within which there is a strong known demand for employment space. This lack of new SEP employment provision in the emerging Local Plan does not match known demand.</p> <p>Furthermore, the opportunity exists to fund through new development and deliver a new dedicated HGV route into the SEP. This would remove the existing HGV access constraint to the SEP and ensure that all deliveries for the 600 people employed and the 500,000 sq. ft of existing tenanted spaces. The Council is aware that all deliveries currently travel through the centre of Badersfield to access the SEP. This constitutes a neighbour nuisance that in combination with the lack of new employment spaces being delivered through the emerging Local Plan acts as an anchor to the economic success of North Norfolk.</p> <p>Glavenhill is also now working with representatives of an established media group, an award-winning TV studio and a major household name global film studio to explore the</p>	<p>Comments noted. Policy SS 1 and HOU 1 set out the approach to housing growth in Small Growth Villages. These and the employment policies have been informed through public consultation. Policy E 2 is designed to ensure that designated employment land within the District is protected for employment uses. The extent of the Enterprise Zones and Airbase Technical Areas are shown on the Policies Map and these allow for employment development which falls within Use Classes E(g) [Uses which can be carried out in a residential area without detriment to its amenity: E(g)(i) Offices to carry out any operational or administrative functions, E(g)(ii) Research and development of products or processes, E(g)(iii) Industrial processes], B2 [General Industrial] and B8 [Storage and Distribution].</p> <p>Policy E 3 allows for new employment generating development outside of employment areas where it can be demonstrated that there is no suitable and available land on designated or allocated employment areas and there are specific reasons for the development no being located on designated or allocated employment areas.</p> <p>Conclusion No change proposed</p>	No	N/A

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				<p>delivery of a new permanent film studio on land adjacent the SEP. This speculative development is designed to meet a known demand for film studio space as recently identified by Norfolk County Council, the New Anglia Local Enterprise Partnership (LEP), North Norfolk District Council and Olsberg SPI. This is a major speculative development that could also be cross-funded by new housing, employment, and care related development at a scale to meet known demand in Badersfield.</p> <p>The current approach as outlined in emerging Local Plan Policy E2 entitled Employment Areas, Enterprise Zones and Former Airbases is too heavily constrained in that it only allows new employment development (such as the film studio proposed) within the Airbase Technical Area (ATA). The land controlled by Glavenhill adjacent the SEP is outside the ATA and as such the emerging Policy is not positively prepared or effective in meeting known employment needs.</p> <p>Glavenhill is seeking amendments to the wording of emerging policies E1 and E2 to allow for new employment growth (including specific references to the film studio project) and enabling residential development at Badersfield. This will enable Glavenhill to raise funding to facilitate delivery of the new film studio project, the new HGV access road to the SEP and linked employment uses. Failure to properly plan for this new economic and enabling growth at Badersfield should not be supported; this is a vibrant community, of work and living, and its continued success should not be hampered by a lack of foresight and proper planning by NNDC.</p>			
PC114	North Norfolk District Council	8.2 Employment Areas, Enterprise Zones & Former Airbases	8.2.4	<p>Last sentence, to correct typographical error, remove the first use of 'would' (keep the comma after 'which') –</p> <p>“Sculthorpe Airbase, being best served by the highway network, is considered to offer opportunities for employment uses which would, for environmental or operational reasons, would not be acceptable on designated Employment Areas within settlements.”</p>	<p>Typographical error requires correction</p> <p>Conclusion Modification proposed for reasons of grammar and clarity</p>	Yes	PMIN/8.2/01
LPS656	Mr Lyndon Swift, Weybourne Parish Council	8.2 Employment Areas, Enterprise Zones & Former Airbases	8.2.4	<p>This does not meet the “Effective” test of soundness.</p> <p>If people have to travel there for work, what is the difference between that and living there and travelling out? If additional facilities were built alongside housing, that would create on-site employment, thereby reducing the need for people to travel away from the area at all.</p> <p>These areas should be included as mixed use (residential, commercial, light industrial) sites, which would allow them to</p>	<p>The Council does not consider that the policy needs be modified in this way. The Plan sets the planning framework for the whole district and considers sustainable development across all three strands, Economic, Social and Environment.</p> <p>The Council have carefully considered the distribution of proposed growth having regard to a range of considerations, including the need for development, particularly affordable homes, capacity of places to support growth having regard to key infrastructure, services and environmental constraints. The Plan focuses growth in areas that will maximise the use of existing infrastructure</p>	No	N/A

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				be in part self-sufficient, reducing pressures on the highways and cutting carbon emissions. The creation of improved public transport networks would be required.	(including water) and will allow infrastructure providers to plan for new facilities in the most efficient way. No specific modification is suggested, and no modifications are required. Conclusion No change proposed		
LPS532	Mr Alastair Curran, Planning Places Ltd (PSK Building Surveyors Ltd)	8.2 Employment Areas, Enterprise Zones & Former Airbases	Policy E 2	<p>Policy E2 does not support redevelopment of employment land through mixed-use proposals, in conflict with paragraphs 81 and 124 of the NPPF.</p> <p>Many employment areas are deteriorating and require heavy investment for repairs or replacement buildings. In certain instances, the cost of retaining employment land that is coming to the end of its commercial life is not viable. As such, other avenues to providing efficient employment land need considering and adopting within the plan making process. It is considered there is scope within Policy E2 to accommodate this.</p> <p>The most efficient way of providing employment land that supports growth, innovation, and improved productivity would be to allow archaic, underused industrial sites to become Mixed Use Allocations where viability is an issue. The revenue from the sale of dwellings, or other uses (such as modern offices or care facilities) on traditional employment sites would facilitate income to upgrade existing buildings/infrastructure, securing the long-term future of the employment land. Equally, with additional finance, new sites could be brought forward with better quality layouts and designs, ensuring new employment sites are better integrated than traditional 'industrial estates.</p> <p>Policy E2 should facilitate the redevelopment of employment land into Mixed Use Allocations where viability is an issue. This would facilitate the protection of some form of employment use, whilst unlocking new investment to allow businesses to expand/modernise as the market demands.</p>	<p>The Council does not consider that the policy needs be modified in this way. Policy E 2 will allow for mixed use developments to reflect the level of flexibility set out within the NPPF and will ensure that designated employment land is protected for employment uses.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS140	Mrs Gemma Harrison (Holt Town Council)	8.2 Employment Areas, Enterprise Zones & Former Airbases	Policy E 2	Holt Town Council wishes to SUPPORT policy E2 as the Town Council welcomes employment land in Holt. The Town Council recognise that it is industry which keeps young families in the town and without the growth in employment opportunities the town of Holt would be a retirement community.	Support noted. The Council does not consider that the policy needs be modified in this way. It is recognised that Holt, Cromer and Sheringham function as a cluster in terms of employment land. Holt benefits from a number of designated employment sites. Land adjacent the A148 is allocated for residential and elderly persons accommodation (Policy H20). The submitted Holt Neighbourhood Plan adds local distinction through Policy Holt 4 – employment growth in Holt.	No	N/A

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				In the LDF Holt was referenced to as a principal settlement and was referenced to meeting the employment needs of a wide catchment, including towns of Cromer, Sheringham and a large part of the AONB. This has not changed and Holt Town Cllrs would like to see a new employment area developed adjacent to the A148 in order to encourage new employment growth to the town. The Local Plan has the ability to be more effective for the town of Holt.	The additional land referred to has not been put forward by the landowner and cannot be considered to be either available or deliverable. Conclusion No change proposed		
PC067	North Norfolk District Council	8.2 Employment Areas, Enterprise Zones & Former Airbases	Policy E2, Criterion 2 (d)	Amend reference to impacts on light to clarify it the potential amenity impact relates to loss of light. This criterion is not concerned with dark skies.	Suggested modification would improve clarity Conclusion Modification proposed to add clarity to the plan.	Yes	PMIN/E2/01
LPS63	Dr Bianca Finger-Berry	8.3 Employment Development Outside of Employment Areas	Policy E 3	Designating NW52 as employment land is not in line with this policy on development outside of employment areas, it does not fulfil any of the criteria set out here and should therefore not happen. Not designating NW52 as employment land.	The nature of allocated employment land is separate and distinct from the operation of Policy E 3. The allocation of NW52 will increase flexibility and choice of employment land in North Walsham but the rationale for the allocation of this site is that it will facilitate the comprehensive infrastructure and HGV road improvements associated with strategic large-scale development in the town. Conclusion No change proposed	No	N/A
LPS350	Mr Alan Presslee, Cornerstone Planning Ltd (Wensum Pools Ltd)	8.3 Employment Development Outside of Employment Areas	Policy E 3	The flexible approach in Policy E3 is welcome, but we contend that sections a) and b) should not be mutually inclusive. In essence, there should be an 'or' and not an 'and' between subparagraphs a) and b). As written, the policy only allows for the expansion of rural businesses if they are unable to find/locate to a site on an allocated employment site. I am sure this 'sequential' approach is unintended; in any event, it is not sound/appropriate. There is no doubt that the NPPF supports sustainable growth/expansion 'in situ', and not as a second option to relocation to a designated employment area (an approach that is at odds with support for a diverse and prosperous rural economy). The policy should be amended to offer clear support for 'in situ' expansion of rural businesses, subject to other policies of the Plan (concerned with highways, landscape, ecology, amenity, etc.).	Modification proposed to ensure that it is clear that the expansion of existing businesses outside of designated areas is acceptable in principle. Conclusion Modification proposed to add clarity to the plan and to better reflect the intention of the policy	Yes	PMIN/E3/01
LPS482	Mr Jake Lambert, Bidwells (Crisp Malting Group)	8.3 Employment Development Outside of Employment Areas	Policy E 3	CMG are a major economic driver for North Norfolk. Over 280 local farmers produce barley, wheat and rye for Crisp in Norfolk. In addition, 200 businesses across East Anglia supply goods and services to CMG, 80 of which are within the NR postcode. CMG's facility in Ryburgh has 115 workers working	Support and comments noted. The Council does not consider it necessary to amend the policy as requested. Highway considerations are an important determining factor. Conclusion	No	N/A

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				<p>on or from the site and it is the headquarters of an international business with turnover of approximately £200 million, 40% of which is generated through exports. In addition, CMG purchases approximately £30 million of raw barley tonnage from Norfolk farms annually, highlighting the significance of CMG within the local rural economy.</p> <p>CMG's Ryburgh site is located outside of a designated employment area, so it is critical that policies in the Local Plan enable sites like this to thrive.</p> <p>To assist with this, criterion 1c of Policy E3 should be deleted. Criterion 1c duplicates Paragraph 111 of the NPPF. CMG wishes to express support for criterion 1a and 1b of Policy E3.</p>	No change proposed		
LPS191	Andrea Long, Compasspoint Planning and Rural Consultants (Wells Town Council)	8.4 Retail & Town Centre Development	8.4.4.	This paragraph should be amended to include reference to the impact of heavy lorries on the condition of the B1105 and generally of traffic management.	<p>References to specific parts of the highway network are not required. The Council does not consider that the supporting text needs to be modified in this way.</p> <p>Conclusion No change proposed</p>	No	N/A
PC070	North Norfolk District Council	8.4 Retail & Town Centre Development	8.4.8, Table 6	<p>Table header incorrectly lists 2016- 2036 amend to <u>By 2026</u></p> <p>Clarification convenience figures for Holt include the Aldi commitment of 912 sq.m convenience sales at £11,557 p.s.m</p>	<p>Modification is proposed for reasons of correction</p> <p>Conclusion Agree to suggested modification</p>	Yes	PMIN/8.4/01
PC115	North Norfolk District Council	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	8.6 (Preamble heading)	<p>Add the following words to the heading of the preamble to align with the name of the Policy.</p> <p>"8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites"</p>	<p>Suggested amendment would provide consistency and clarity.</p> <p>Conclusion Modification proposed for reasons of consistency and clarity</p>	Yes	PMIN/8.6/01
PC120	North Norfolk District Council	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Para 8.6.5	In the last sentence amend reference to Natura 2000 Sites to Habitats Sites.	<p>Amendment would provide consistency with other references throughout the plan.</p> <p>Conclusion Modification proposed for reasons of consistency</p>	Yes	PMIN/8.6/02
LPS326	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	Part 1b. and footnote 1 of the draft policy are considered unduly onerous and restrictive in the limits it imposes on the type of development permitted and within which locations. The proposed amendments are intended to adopt a more positive approach to development that is consistent with national policy and the support it expresses towards the sustainable growth and expansion of all types of business in rural areas, including through well-designed new buildings, sustainable rural tourism and leisure developments which respect the character of the countryside (NPPF Para 84).	<p>The Council does not consider that the policy needs to be modified in this way. The policy's purpose is specifically to ensure that new build tourist accommodation, static holiday caravans and holiday lodges are located in appropriate locations and to allow flexibility for existing businesses within the countryside the opportunity to expand where appropriate. This will protect the area and enable visitors to access a range of services by a choice of travel modes.</p> <p>The Plan as a whole will enable the 'sustainable' growth and expansion of all types of business in rural areas.</p> <p>Conclusion</p>	No	N/A

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				<p>Proposed Amendment</p> <p>1. Proposals for new tourist accommodation, static holiday caravans and holiday lodges (1) will be supported where:</p> <p>a. the site is within the boundary of a Selected Settlement; or,</p> <p>b. the proposal is for a replacement facility or well-designed new building(s) which supports diversification of agricultural and other land-based rural businesses static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3; (2) and, ...</p> <p>(1) Including buildings such as cabins, holiday accommodation, and guest houses, hotels.</p>	No change proposed		
LPS74	Mr John Long, John Long Planning Ltd (Blakeney Hotel)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	<p>Blakeney Hotel request that the Policy is amended to confirm that the Section 2 and the application of the sequential test is for proposal for new hotels only; and that the expansion of existing hotel businesses to provide additional tourism accommodation is exempt from the sequential test, to ensure that existing hotel businesses are able to grow and expand to meet business and visitor needs:</p> <p>“2. Where the development is for a new hotel, this should demonstrate compliance with the sequential approach in accordance with national retail policy and Policy E 4 ‘Retail & Town Centre Development’.”</p>	<p>Proposed modification to clarify that criterion 2 applies to new hotels rather than all hotel development.</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/E6/01
LPS82	Mr John Long, John Long Planning Ltd (Blue Sky Leisure)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	<p>Blue Sky Leisure can support Policy E 6 particularly point 1. b.</p> <p>Suggest that for clarity Policy E 6 Section 3 should refer to the extensions to existing tourist accommodation, static caravans and holiday lodges ‘sites’, which is assumed to be the intention and as implied by the policy title, rather than the extensions to individual static caravan and lodge ‘units’. It is assumed that extensions to individual units, such as verandas/decking will be dealt with by the usual development management policies.</p> <p>Suggested modification:</p> <p>1 Business expansion and extensions to existing tourist accommodation, static caravan sites and holiday</p>	<p>Support and comments noted. Modification proposed for reasons of clarity with regard to criterion 3 and reference to sites.</p> <p>Conclusion Modification proposed to add clarity to the plan.</p>	Yes	PMIN/E6/02

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				lodges sites will be supported where:			
LPS108	Dr Victoria Holliday	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	<p>New proposals/ expansion of existing tourist accommodation, static caravans and holiday lodges will be supported – the North Norfolk economy is at risk of being overly dependent on the visitor economy and surely we should look elsewhere for economic growth. Is this sustainable tourism? This policy mentions the impact on the AONB but not specifically the other protected sites such as RAMSARs and SSSIs.</p> <p>Proposals for new tourist accommodation or extensions of existing should be limited and weighed against other opportunities for economic growth, and the impact on designated habitat sites assessed and mitigated.</p>	<p>Comments noted. This policy is specific to these types of development proposals, recognising that the tourist sector is a significant part of the North Norfolk economy. The economic prosperity of North Norfolk is irrevocably linked to the success of its tourism sector. North Norfolk has one of the most distinctive and diverse tourism offers in the East of England, with the main appeal being its ‘unique environmental assets’ of coastline and beaches, the Broads and inland areas of countryside, which ‘therefore represent the core foundation for the future development of tourism within North Norfolk’.</p> <p>The Plan provides support for all sections of the economy and seeks to broaden the economic base of the District through a suite of economic policies in line with the Plan’s aims and objectives.</p> <p>As with all new development, proposals for any accommodation will only be allowed after it has been demonstrated that no adverse impact on the integrity of National and International sites will result and these issues are covered by other policies of the Plan. Policies elsewhere in the Plan provide adequate protection for other land use designations.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS296	Mr Sam Hazell, Lawson Planning Partnership Ltd (White Lodge Norwich Ltd)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	<p>Policy E6 is overly restrictive by only supporting proposals for new tourist accommodation where the site is within the boundary of a selected settlement. (see attached file)</p> <p>The wording of the Policy E6 criteria 1a should be amended and proposals supported where:</p> <p>the site is within the boundary of a Selected Settlement, or the proposals are small-scale and well-related to a Selected Settlement or established tourism attraction; or.....,</p> <p>“Sustainable” does not mean that such development should all be restricted to sites within a selected settlement, or just involve the replacement of an existing holiday caravan or lodge.</p> <p>The policy should be amended to offer clear support for sustainable rural tourism, in accordance with the NPPF. Not unconstrained/uncontrolled development; but not limited to designated settlements either. It is acknowledged that such development should “respect the character of the countryside” (as indicated by the NPPF) and so consider that criteria d) i - iv of Policy E6 (and other policies of the Plan</p>	<p>Several representations have been made that consider Policy E 6 to be too restrictive. There are some subtle differences between the points raised.</p> <p>The Council does not consider that the policy needs be modified. Other policies in the plan provide a supportive context for tourism development. This policy relates to specific types of holiday accommodation and restricts the proliferation of these across the countryside whilst allowing for extension of existing businesses in this rural district. This will protect the area and enable visitors to access a range of services by a choice of travel modes.</p> <p>Proposals relating to new tourist attractions and extensions are considered under Policy E 8. The Plan as a whole will enable the ‘sustainable’ growth and expansion of all types of business in rural areas.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS351	Mr Alan Presslee, Cornerstone Planning Ltd (Wensum Pools Ltd)						
LPS332	Miss Charlotte Hatton, DPP (The Barsham Estate)						

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LPS376	Mr Garth Hanlon, Savills UK Limited (Holkham Estate)			<p>concerned with highways, landscape, ecology, amenity, etc.) are appropriate in determining such.</p> <p>Part 1 of Policy E6 is positively framed, and this is welcomed however it sets out a very restrictive set of circumstance where new development will be permitted. We consider that this part of the policy does not reflect the positive approach set out in the NPPF.</p> <p>We wholly support Part 3 of Policy E6. Part 3 of Policy E6 is positively framed and permits tourism and leisure development provided there is no adverse harm. We have no comments in respect of Part 2 and Part 4 of Policy E6.</p> <p>We recognise that it is appropriate to have a criterion that deals with new tourism and leisure developments. We suggest that Part 1 of Policy E6 should be modified to set out a range of criteria that needs to be satisfied rather than what is effectively a blanket prohibition.</p> <p>The policy is unduly restrictive given the expectation in National Planning Policy Framework para 84 (c) that sustainable rural tourism and leisure developments which respect the character of the countryside will be enabled.</p> <p>The strategic policy of the plan to protect the countryside is Policy SS 2 and there is no need for Policy E6 to seek to reaffirm it. The proposed Policy E6 should be revised to address the following points –</p> <p>In relation to Policy E6.1.a.</p> <p>Recommend insert new section c –</p> <p>Special circumstances relating to the location of the site or the nature of the proposed development are shown to justify development in the countryside having regard to paragraph 176 of the NPPF and other material considerations</p> <p>Renumber sections c and d accordingly.</p> <p>In relation to Policy E6 1.b</p> <p>The opportunity to provide new tourist accommodation under this proposed provision is limited to the opportunity to</p>			

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LPS412	Mr Iain Hill, Bidwells (Bidwells LLP)			<p>replace an existing facility. The test should be the acceptability of the impact of development, including new development.</p> <p>In relation to E6 1.d</p> <p>The wording of this criterion prevents development which might offer significant benefits in terms of removing current risks, harms and impacts that outweigh a new significant impact. The wording should be changed to require proposals to evidence an overall net benefit from the development in order to be permitted.</p> <p>Recommend insert additional wording –</p> <p>The proposal is for replacement or expansion of static caravan or holiday lodge accommodation including proposed relocation and new sites and</p> <p>the proposal demonstrates measurable biodiversity net gains; and, the proposal offers overriding advantages in terms of Coastal Management Change or Flood risk objectives, social, economic or environmental benefits sufficient to outweigh any significant detrimental impact upon:</p> <p>i the defined special qualities of the Area of Outstanding Natural Beauty;</p> <p>ii the key characteristics and valued features of the defined Landscape Type;</p> <p>iii. residential amenity; and,</p> <p>iv the safety and operation of the local highway network.</p> <p>Policy E6 2 proposed provision is not clearly thought through and creates unreasonable barriers to tourism-based hotel development outside town or settlement centre locations.</p> <p>It is inappropriate to require a retail sequential test and specifically, the reference to proposed Policy E4 'Retail & Town Centre Development' which has no relevance to hotel proposals. The policy considerations should be cast wider in terms of special circumstances for development beyond town centres, to recognise the social, environmental and economic benefits of delivering accommodation and visitor facilities close to the areas where tourists wish to visit and spend their time.</p> <p>Recommend rewording –</p> <p>2.i) Where the development is for a hotel within an existing settlement it is located in the town centre where a suitable site is available or</p> <p>2.ii) Where the development is for a hotel in a countryside location the application evidences overriding social,</p>			

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				<p>economic or environmental benefits sufficient to outweigh any significant detriment to the natural and local environment, including any formal designations in this plan.</p> <p>E6 3 lists potential adverse impacts arising from a proposal but does not allow for exceptional circumstances or the opportunity for specific benefits or mitigations to outweigh an element of harm.</p> <p>Recommend rewording –</p> <p>b. the application evidences overriding social, economic or environmental benefits sufficient to outweigh any significant detriment to the natural and local environment, including: any formal designations in this plan the defined qualities of the Area of Outstanding Natural Beauty the key characteristics and valued features of the defined landscape residential amenity; and the safety and operation of the local highway network.</p> <p>On behalf of the owners of The Pigs, Edgefield (TBE).</p> <p>It is essential that any planning policy relating to the development of tourist related facilities provides sufficient flexibility to allow businesses to respond to changes in market demand.</p> <p>Policy E6 contains a presumption against new build tourist accommodation in the countryside, unless it relates to the expansion of an existing business. The nature of the tourist sector is changing with, amongst other things, increasing demand for self-catering accommodation in rural areas. There will potentially be cases where new business ventures seek to locate in a rural area. As drafted the Policy precludes this.</p> <p>It is suggested that rather than excluding new build tourist accommodation in the countryside, Policy E6 should recognise that applications for new build tourist accommodation, which is not linked to an existing business, will be permitted in the countryside where it can be demonstrated that the proposal would not have a detrimental impact on the environment.</p> <p>As well as providing more flexibility, this approach is considered to be a more robust means of assessing the suitability of a proposal. Policy E6 is inconsistent with</p>			

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LPS483	Mr Alastair Curran, Planning Places Ltd (Woodland Caravan Site Trimmingham Ltd)			<p>paragraph 84 of the NPPF. The flexibility for new tourist accommodation to be developed in the countryside, irrespective as to whether it relates to an existing business, is incorporated in the relevant policies of a number of other Local Plans which have either recently been, or are about to be, adopted. [examples provided from Waveney and Breckland 2019]</p> <p>Policy E6 is also inconsistent with draft Policy SS 2 Development in the Countryside and Policy E8 New Tourist Attractions & Extensions which, subject to the satisfaction of certain criteria, permits new build facilities for tourist attractions in designated countryside. It is, in our view, perverse to adopt a different approach in relation to tourist accommodation and tourist attractions.</p> <p>To make the policy sound the following amendments to criterion 1 are proposed:</p> <p>Deleted Text - Strikethrough</p> <p>Italics Text – Proposed Amendment</p> <p>Proposals for new tourist accommodation, static holiday caravans and holiday lodges(1) will be supported where:</p> <p>a. the site is within the boundary of a Selected Settlement The proposal would enhance the tourism offer, benefit the local economy and be of a suitable scale and type for its location,</p> <p>b. The development is of a scale where the environment and infrastructure of the location can accommodate the visitor impact; or</p> <p>c. the proposal is for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3;(2) and,</p> <p>d. the proposal demonstrates measurable biodiversity net-gains; and,</p> <p>e. the proposal would not have a significant detrimental impact upon:</p> <p>i. the defined special qualities of the Area of Outstanding Natural Beauty;</p> <p>ii. the key characteristics and valued features of the defined Landscape Type;</p> <p>iii. residential amenity; and,</p> <p>iv. the safety and operation of the local highway network.</p>			

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				<p>It is considered that Policy E6 could be more effective in terms of facilitating tourist development. Although the policy appears to be supportive, realistically Policy E6 will provide limited support to most existing tourism businesses. Unless the policy allows for the planning balance (provision of public benefits to outweigh any limited harm to the landscape), or require specific improvements, such as 'enhanced landscaping' most sites would not be able to expand through Policy E6.</p> <p>A potential solution would be for the policy to allow the expansion of existing sites, through nearby, but not necessarily adjoining, land. Instead allowing for one static caravan site to exist, but be located in different locations, but with an internal shuttle service being provided to facilitate the transport of patrons between 'hubs' could be a way to ensure development and expansion is possible, without resulting in potentially harmful impacts upon the AONB or special landscape character areas.</p> <p>Through expanding upon the wording of Policy E6, and acknowledging the multiple constraints typically associated with existing tourist accommodation sites, the Policy could be made more effective and more positively prepared.</p>			
LPS473	Mr Alastair Curran, Planning Places Ltd. (Woodland Caravan Site Trimmingham Ltd)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	<p>Policy E6 is considered to be sound, in that it facilitates the expansion of existing tourism sites resulting in a justified, effective, positively prepared policy that is consistent with national policy.</p> <p>The Covid 19 pandemic and the continuous rise in living costs (including heating), has resulted in tourism businesses requiring greater revenue to survive. The most effective way for businesses within the tourism industry, particularly caravan and lodge sites, to generate greater revenue is to expand through additional accommodation. By supporting developments for sustainable expansion, policy E6 meets the objectively assessed needs of the local area showing that the policy is both positively prepared and somewhat effective.</p> <p>The policy is considered to be consistent with national policy as it enables to a degree sustainable rural tourism and leisure developments which respect the character of the countryside as per paragraph 84 of the National Planning Policy Framework (NPPF), 2021.</p>	<p>Support noted. This representation contradicts those made by this person under LPS483.</p> <p>Conclusion No change proposed</p>	N/A	N/A

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				<p>The policy is considered to be legally compliant and follows the council's duty to cooperate. The policy is part of a local plan which has followed the councils adopted Local Development Scheme (LDS) and has emerged as part of a process of community involvement. The council has also provided a sustainability appraisal report alongside this plan which is considered sound.</p> <p>On this basis Policy E6 is considered to be sound.</p>			
LPS345	Miss Natalie Beal (Broads Authority)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6	<p>Comment</p> <p>This section does not mention the Broads. The type of development could impact the setting of the Broads. This issue can be addressed by referring to the setting of the Broads.</p> <p>Relevant part of NPPF</p> <p>The Broads and the setting of the Broads is protected at NPPF paragraph 176</p> <p>Proposed change</p> <p>E6 1 d i: the defined special qualities of the Area of Outstanding Natural Beauty and the Broads.</p> <p>E6 3 b i: the defined special qualities of the Area of Outstanding Natural Beauty and the Broads.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The policy is only applicable to proposals within the District. The setting of the Broads is included in the Policy ENV 1 which is specific in its purpose to ensure that the statutory duty and appropriate high level of protection is given to designated landscapes such as the Broads. Relevant decisions will be made with reference to the Development Plan as a whole.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS686	Ms Laura Joyce (Natural England)	8.6 New Tourist Accommodation, Static Caravans & Holiday Lodges, & Extensions to Existing Sites	Policy E 6 (& supporting text) Para 8.6.5)	<p>Sound – subject to project level HRA where required and the recommendations outlined below.</p> <p>We support the recommendation of the HRA which states that wording or supporting text could be strengthened and cross-referenced to ENV5 or GIRAMS. Natural England supports the consideration of environmental net gain within these policies as well as the need to demonstrate no adverse effects on the special qualities of the protected landscape, coastal landscape and AONB.</p>	<p>Support and comments noted. There is merit for clarification to include a further reference within Para 8.6.5 to link to GIRAMS. It is recognised that tourism accommodation proposals will be required to contribute to strategic mitigation measures as outlined in Policy ENV 5. This modification would align the text with a recommendation made by the Council's Habitats Regulation Assessment 2021 (HRA) to strengthen the link between Policy E 6 and Policy ENV 5 and GIRAMS.</p> <p>Conclusion Modification proposed to add clarity to the plan</p>	Yes	PMIN/8.6/03
LPS230	Ms Sarah Mitchell (RSPB)		Policy E 6				

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				We find this policy to be effective but thought including cross-referencing with the GIRAMs work here would be of benefit.			
LPS231	Ms Sarah Mitchell (RSPB)	8.7 Touring Caravan & Camping Sites	8.7.2	<p>We suggest the presumption set out in para 8.7.2 is incorrect. The impact of a growing tourism industry has considerable potential for increased recreational disturbance throughout the year and should be given greater scrutiny. This issue has been highlighted during the pandemic; a period where we have seen an increase in the number of s.73 planning applications made by holiday parks and accommodation providers who wish to extend site seasonal occupancy and holiday site footprint as well as s106 applications for 'pop-up' campsites. We have found the rise in holiday accommodation planning applications along the Norfolk coast alarming and have also raised the issue with King's Lynn and West Norfolk Borough Council.</p> <p>Suggest the statement is taken out of the Plan unless it can be evidenced. Acknowledgement of the growing disturbance and pressures on infrastructure and the environment as a result of a growing holiday park sector which is often now open for the majority of the year should be made.</p>	<p>The Council does not consider that the text needs be modified in this way. The supporting text adequately describes the nature of seasonal uses. Recreational impacts are recognised by a proposed modification in relation to LPS686.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS109 LPS605	Dr Victoria Holliday Ms Kerry Harris (Thornage Parish Council)	8.7 Touring Caravan & Camping Sites	Policy E 7	<p>Point 1c- are there certain landscape characters or conservation areas (in addition to AONB etc) where new sites would not be permitted?</p> <p>There should be an additional point 1e that these should not be sited in specific landscape characters and conservation areas.</p> <p>Policy SS2 (Development in the Countryside) is applied to the designated Countryside Policy Area, as defined on the Policies Map. While the policy approach is welcome, including the reference to rural conservation areas (para. 4.2.1) it is noted that the list of permissible development includes criterion (f) "recreation and tourism".</p> <p>However, landscape sensitivity needs to remain a primary consideration. Currently, a mixed message is given when policy E7 (Touring Caravans & Camping Sites) is also taken into consideration; for while it is worded in a promotional way it directs the applicant away from those areas which are visually sensitive. However, conspicuous by its absence, is any</p>	<p>The Council does not consider that the policy needs be modified in this way. Adequate protection is provided in relation to landscape characters and conservation areas elsewhere in the plan. Relevant decisions will be made with reference to the Development Plan as a whole.</p> <p>Conclusion No change proposed</p>	No	N/A

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				<p>express reference to the Glaven Valley Conservation Area ("GVCA"), which is the only rural conservation area within the district.</p> <p>In the interests of soundness additional words need to be added to ensure that the intended objective of this policy is more effectively achieved. The Parish Council proposes "or a rural Conservation Area" be added to Policy E7(1)(c). This choice of words provides the right emphasis and more easily contrasts the GVCA boundaries (and lack of suitability for E7 uses) with those of the individual settlement conservation areas (where different considerations might apply).</p> <p>The amended policy would then read:</p> <p>c. the site lies outside of the boundary of a Selected Settlement but does not lie within the AONB, Heritage Coast, or Undeveloped Coast or a rural Conservation Area; and,...</p>			
LPS209	Mrs Gemma Harrison (Cley Parish Council)	8.7 Touring Caravan & Camping Sites	Policy E 7	<p>Cllrs fully support this policy but ask that consideration is given to not allow wild camping in some of the most sensitive areas of the AONB North Norfolk coastline.</p>	<p>Support and comments noted. Generally, it is illegal to wild camp in England without the express permission of the landowner. Many landowners are happy to host wild campers, but only if they are respectful of the area in which they are camping. In any event wild camping is likely to fall outside of the remit of planning control and it is not, therefore, necessary for the Plan to consider this matter.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS346	Miss Natalie Beal (Broads Authority)	8.7 Touring Caravan & Camping Sites	Policy E 7	<p>This section does not mention the Broads. The type of development could impact the setting of the Broads. This issue can be addressed by referring to the setting of the Broads at policy E7 3.</p> <p>Relevant part of NPPF</p> <p>The Broads and the setting of the Broads is protected at NPPF paragraph 176.</p> <p>Proposed change</p> <p>In all cases proposals must demonstrate measurable biodiversity net-gains; and that the proposal would not have a significantly detrimental impact upon: The key characteristics and valued features of the defined Landscape Type; the Broads, residential amenity; and the safety and operation of the local highway network.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The setting of the Broads is included in the Policy ENV 1 which is specific in its purpose to ensure that the statutory duty and appropriate high level of protection is given to designated landscapes such as the Broads. Relevant decisions will be made with reference to the Development Plan as a whole.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS687	Ms Laura Joyce (Natural England)	8.7 Touring Caravan & Camping Sites	Policy E 7	<p>Sound – subject to project level HRA where required and the recommendations outlined below.</p>	<p>Support and comments noted. There is merit for clarification to include an additional paragraph within the supporting text to directly reference a link to GIRAMS. It is recognised that tourism accommodation proposals will be required to contribute to</p>	Yes	PMIN/8.7/01

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LPS230	Ms Sarah Mitchell (RSPB)			<p>We support the recommendation of the HRA which states that wording or supporting text could be strengthened and cross-referenced to ENV5 or GIRAMS.</p> <p>Natural England supports the consideration of environmental net gain within these policies as well as the need to demonstrate no adverse effects on the special qualities of the protected landscape, coastal landscape and AONB.</p> <p>We find this policy to be effective but thought including cross-referencing with the GIRAMS work here would be of benefit.</p>	<p>strategic mitigation measures as outlined in Policy ENV 5. This modification would align the text with a recommendation made by the Council's Habitats Regulation Assessment 2021 (HRA) to strengthen the link between Policy E 6 and Policy ENV 5 and GIRAMS.</p> <p>Conclusion Modification proposed to add clarity to the plan</p>		
LPS110	Dr Victoria Holliday	8.8 New Tourist Attractions & Extensions	Policy E 8	<p>Point 2 - conservation areas are omitted</p> <p>Point 2 - add in no detrimental impact on conservation areas</p>	<p>The Council does not consider that the policy needs be modified in this way. Adequate protection is provided in relation to conservation areas elsewhere in the plan. Relevant decisions will be made with reference to the Development Plan as a whole.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS347	Miss Natalie Beal (Broads Authority)	8.8 New Tourist Attractions & Extensions	Policy E 8	<p>This section does not mention the Broads. The type of development could impact the setting of the Broads. This issue can be addressed by referring to the setting of the Broads at policy E8 2.</p> <p>Relevant part of NPPF</p> <p>The Broads and the setting of the Broads is protected at NPPF paragraph 176.</p> <p>Proposed change</p> <p>In all cases proposals must demonstrate measurable biodiversity net-gains; and that the proposal would not have a significantly detrimental impact upon: The key characteristics and valued features of the defined Landscape Type; the Broads residential amenity; and the safety and operation of the local highway network.</p>	<p>The Council does not consider it necessary to amend the policy as requested. The setting of the Broads is included in the Policy ENV 1 which is specific in its purpose to ensure that the statutory duty and appropriate high level of protection is given to designated landscapes such as the Broads. Relevant decisions will be made with reference to the Development Plan as a whole.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS688	Ms Laura Joyce (Natural England)	8.8 New Tourist Attractions & Extensions	Policy E 8	<p>Sound – subject to project level HRA where required and the recommendations outlined below.</p> <p>We support the recommendation of the HRA which states that wording or supporting text could be strengthened and cross-referenced to ENV5 or GIRAMS.</p>	<p>Support and comments noted. The plan wide HRA advises that tourism proposals will bring risks to European sites from recreation, and the coastal sites will have a particular draw. The Council does not consider it necessary to amend the policy or supporting text as requested as this policy is not concerned with proposals for new overnight units of accommodation and therefore GIRAMS is not applicable. Policy ENV 4 ensures risks to biodiversity and geodiversity are addressed for all types of development.</p>	No	N/A

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LPS230	Ms Sarah Mitchell (RSPB)			<p>Natural England supports the consideration of environmental net gain within these policies as well as the need to demonstrate no adverse effects on the special qualities of the protected landscape, coastal landscape and AONB.</p> <p>We find this policy to be effective but thought including cross-referencing with the GIRAMs work here would be of benefit.</p>	<p>Conclusion No change proposed</p>		
LPS326	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)	8.8 New Tourist Attractions & Extensions Economy	Policy E 8	<p>Part 1a. and footnote 2 infer a blanket restriction on new build tourist attractions in the AONB, which is unduly onerous and inconsistent with national policy, which imposes no such bar on development in these locations. The NPPF at paragraph 84 expresses support for the sustainable growth and expansion of all types of business in rural areas, including through well-designed new buildings, sustainable rural tourism and leisure developments which respect the character of the countryside. The proposed amendments to the policy are necessary to ensure it is positively prepared and consistent with national policy.</p> <p>1. The Council will support proposals for new build tourist attractions (1) and extensions to existing attractions across the District. Proposals will be supported where:</p> <p>a. the site is not within the designated AONB, Heritage Coast, or Undeveloped Coast; (2) , unless it can be demonstrated that such a location is necessary</p> <p>b. it has been demonstrated that there are no suitable buildings for re-use in the locality; ...</p> <p>2. Unless it can be demonstrated that the location is integral to the development</p> <p>1.a This section is unduly restrictive and amounts to a blanket prohibition of tourist development in the AONB, Heritage Coast or Undeveloped Coast areas. The policy should at the very least allow for the consideration of the specific merits of any proposed new development in the three designated areas and set out the weight to be accorded to different material considerations. It may well be the case that a significant harm arising from new development is outweighed by the benefit of removing an existing impact or introducing other new merits.</p> <p>This policy should also be reworded to recognise that any harmful impact must be shown to be mitigated or outweighed by social, environmental or economic benefits</p>	<p>The Council does not consider that the policy needs be modified in this way. The policy's purpose is to ensure that tourist attractions that broaden the tourism opportunities across the District and extend the tourist season are encouraged in appropriate locations. It does not impose a blanket restriction on such developments in the AONB, Heritage Coast or Undeveloped Coast but ensures, amongst other matters, that the scale and extent of development in these sensitive areas is limited. Further, it is considered that the policy provides an appropriate degree of flexibility to achieve the objectives that are suggested by LPS379.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS379	Mr Garth Hanlon, Savills UK Limited (Holkham Estate)						

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LPS530	Mr Alastair Curran, Planning Places Ltd (Woodland Caravan Site Trimmingham Ltd)			<p>Recommend rewording –</p> <ol style="list-style-type: none"> 1 The Council will support proposals for new build tourist attractions and extensions to existing attractions across the District. Proposals will be permitted where: <ol style="list-style-type: none"> a. the site is not within the designated AONB, Heritage Coast, or Undeveloped Coast it has been demonstrated that there are no suitable buildings for re-use in the locality b. the application is supported by details sufficient to satisfy the Local Planning Authority that the merits of the proposal in terms of social, environmental and economic impacts outweigh any identified harm, and particularly any harm to the designated AONB, Heritage Coast, or Undeveloped Coast; 2 In all cases, proposals must demonstrate measurable biodiversity net-gains and fully address landscape, residential amenity and highway network considerations <p>It is considered that policy E8 should be revised considering its conflict with the NPPF and policy E6 of this plan. Instead, it should be reworded to facilitate appropriate development in the AONB and sensitive landscape areas, especially where it can be proven there would be no, or limited impacts as per paragraphs 176 and 177 of the NPPF but wider benefits to the public or existing businesses.</p>			
LPS111	Dr Victoria Holliday	8.9 Retaining an Adequate Supply & Mix of Tourist Accommodation	Policy E 9	<p>Point 2 - where will replacement tourist accommodation be allowed? Elsewhere in the vicinity isn't very specific. Should replacement tourist accommodation be in less sensitive landscapes? What sort of development proposals would be supported- to principal residency for example? Again, as said elsewhere, is North Norfolk too dependent on tourist accommodation? reuse should be to principal residences or affordable housing'</p> <p>Point 2 should be more specific about where replacement accommodation should be allowed. There should be more flexibility about the use away from tourist accommodation.</p>	<p>Comments noted, any replacement facility would have to accord with the other policies in the plan.</p> <p>Conclusion No change proposed</p>	No	N/A
LPS134	Mrs Gemma Harrison (Holt Town Council)	8.9 Retaining an Adequate Supply & Mix of Tourist Accommodation	Policy E 9	<p>Holt Town Council are keen to see an increase in permanent residential development and therefore OBJECT to this policy. Town Cllrs don't see the need in securing future holiday lets, there is already a huge pressure on housing stock in North Norfolk with the attractive holiday lets being 2/3-bedroom houses which is also the starter homes needed for first time buyers. The high level of holiday let accommodation is driving</p>	<p>Other policies seek to meet the identified housing needs, including the need for affordable housing. The policy is only applicable to proposals that require express planning permission. It applies to all types of holiday accommodation, including hotels and seeks to retain an adequate supply of holiday accommodation up to the point where it remains viable. The policy allows for alternative</p>	No	N/A

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LPS210	Mrs Gemma Harrison (Cley Parish Council)			<p>up prices of residential accommodation for so many residents, making it impossible for them to afford to stay in the places they have grown up in. Town Cllrs feel that North Norfolk is a long way from losing its tourist accommodation and instead more needs to be done to protect and retain existing permanent residents. Therefore, Holt Town Council question how sound this policy is and asks the Inspector to look at the evidence base and in particular compare it to other evidence, such as housing availability, house prices etc.</p> <p>Policy not needed or amended to just deal with Hotels.</p> <p>Cley Parish Council object to keeping an adequate supply of holiday accommodation, by ensuring a holiday let is replaced elsewhere if it goes back into another use. The demand for housing stock for local families is such that residential housing for local families should be a priority. This policy should be amended to maybe just focus on larger hotels. Many areas of North Norfolk suffer from a high percentage of holiday lets and therefore this policy doesn't reflect the need for an increase in local housing stock, therefore is unsound and not effective</p> <p>Amend to focus just on larger hotels and not smaller holiday lets.</p>	<p>uses but supports the tourist economy by ensuring a good mix and supply to meet demand.</p> <p>A change of use to permanent residential accommodation can help to address the need for new homes, make good use of existing buildings, and reduce the need to build elsewhere but the loss of holiday accommodation may reduce choice, have an adverse economic impact and may, in the longer term, increase the pressure for replacement holiday buildings.</p> <p>Priority is given to the retention of holiday accommodation because of its contribution to the local economy.</p> <p>Conclusion No change proposed</p>		
LPS324	Roger Welchman, Armstrong Rigg Planning (Kelling Estate LLP)	23 Housing Trajectory	Para 23.0.9	<p>The Council has not published a five year housing land supply statement since April 2020, contrary to the requirement at NPPF paragraph 74 to update its supply position annually. In this context, it is not possible to undertake a full review of the Council's current housing supply position as the Housing Trajectory contained in the Local Plan does not contain delivery forecasts for specific sites with planning permission (it simply contains a total annual delivery forecast for all existing sites with planning permission). However, based on the information contained in the Housing Trajectory, the Council cannot demonstrate a 5year supply of housing for either the 2022/23 to 2026/27 5year period or the 2023/24 to 2027/28 5year period. As set out in more detail below and in the enclosed Revised Housing Trajectory, we must therefore conclude that the Council will not be able to demonstrate a 5year housing land supply on adoption of the Local Plan, contrary to NPPF paragraph 68</p> <p>We have identified issues with numbers in: windfall; small growth sites; new allocations – results in council only being able to demonstrate a supply of 2,104 dwellings during 22/23 to 26/27 period and 2,144 dwellings during the 23/24 to 27/28 period.</p>	<p>The policies in the Plan seek to deliver the quantity of homes necessary to meet the assessed needs of the District.</p> <p>National policy allows a departure from the standard methodology if exceptional circumstances justify such an alternative approach. Explanation is provided for the Council's deviation from the standard methodology. It is considered that the plan accurately reflects the objectively assessed needs of the area. Further detail is provided in background paper No 2.</p> <p>The plan sets a minimum housing requirement of 9,600 new homes between 2016 and 2036, equating to an annual average rate of around 480 dwellings per year, or 2,400 every five years. The Plan sets this as a minimum but includes policies and specific development site proposals that together allow for the delivery of at least 12,000 new homes.</p> <p>The Council does not consider the policy needs to be altered.</p> <p>Conclusion No change proposed</p>	No	N/A

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LPS800	Mr Darl Sweetland (Anglian Water)	24 Monitoring Framework	24.0.4	Water requests that paragraph 24.0.4 sets out responsibility for the monitoring including provision through planning conditions and the potential steps which may be required of a developer whose developments when occupied fail to achieve 100% compliance with the water efficiency standard.	The Monitoring Framework establishes what the LPA will monitor and is implicit that the responsibility for monitoring remains with the LPA Conclusion No Change proposed Implicated that it is the councils remit ... no change	No	N/A
PC106	North Norfolk District Council	Glossary	Glossary	Update references to STP to reflect the change to ICS in the Planning for Health entry in the glossary	Conclusion Agree to requested modification(s)	Yes	PMIN/GLS/01
PC009	North Norfolk District Council	Glossary	Glossary	In relation to Policy CC3 what is net zero ready mean?	Add to glossary : Net zero carbon ready homes are those homes that are built with high energy efficiency and using low carbon technologies (e.g., heat pumps or other forms of electric heating instead of gas boilers) that will become net zero carbon when the national electricity grid is decarbonised	Yes	PMIN/GLS/02
PC123	North Norfolk District Council	Appendix 2: Open Space Table 13	Natural Green Space / Amenity Green Space	For reasons of clarity and consistency update references to native trees to appropriate native trees.	Modification(s) is proposed for reasons of clarity Conclusion Agree to suggested modification	Yes	PMIN/ Table13/01
LPS660	Mr Lyndon Swift (Weybourne Parish Council)	Appendix 4: Growth Levels in Small Growth Villages	28.0.3	Community-led development should be included in the total number of houses. Community-led housing should be prioritised as it is likely to meet local needs, be more acceptable to local communities and fit in better with its location than commercial market housing where profit is inevitably the underlying motivation. The prioritisation of community-led housing would reassure the local community and improve relations between parish councils and NNDC and its planning department. It is also likely that community-led housing could be constructed more quickly as there would be fewer objections and less requirement for changes to plans, especially if NNDC's planning department cooperates with and supports community-led development from its early stages.	Comments noted. The Council does not consider it necessary to amend Para. 28.0.3 as requested. The matter of community-led housing is supported under Policy SS3, which encourages community-led affordable housing schemes to meet local need. Community Land Trusts that operate community facilities are supported by the council and encouraged through this Plan. This is in addition to the overall distribution of development set out in Policy SS1, which provides the framework to deliver the growth necessary to meet the District's strategic housing needs. The approach to the distribution of housing within the Small Growth Villages is set out in Table 2 of Policy SS1, which allows for an indicative housing allowance of 6% growth. Conclusion No change proposed.	No	N/A
LPS286	Mrs Clare Stagg	Appendix 4: Growth Levels in Small Growth Villages	Appendix 4 Policy SS1	As a resident to East Runton I am keen to ensure protection of all of the current village amenity. However I am keen to ensure any policy protects all current village amenity - in terms of retail and A4 use and takeaway. We have lost in the last few years the Village tea rooms with associated shop, the Kit Bag and the Constantia. To preserve village amenity, tourism and employment i would like the plan to support new retail/A4 uses, and enshrine in policy of strong protections of what is existing. This supports local use and is environmentally friendly in so far as not requiring village residents to have to drive to other locations - and supports tourism - the village is on the coastal path and creates local employment. Housing where developed should focus on affordable housing for locals - not second homes. There is limited need and what need there is surely is for locals as such i would like the policy	Comments noted. The plan seeks to support local services and planned growth is directed to those identified settlements, including East Runton, in order to sustain and enhances services and facilities. No specific modification is suggested. Conclusion No change proposed.	No	N/A

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				to be strengthened so it protects existing amenity and allows for reasonable expansion and housing is for locals who will reside full time in the village.			
PC110	NNDC	Whole Document	Various	The District Council has identified a range of basic issues throughout the plan which are viewed as logical corrections to phrasing, grammar, spelling or pagination. While insignificant in their individual capacity, when corrected these will cumulatively help to improve the overall integrity, robustness and effectiveness of the Plan. The Council recommends that these are accepted en bloc.	The proposed changes are tabled at the end of Schedule 4. Conclusion Agree to requested modifications.	Yes	PMIN/MISC/01

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