

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

Schedule 3 (Sites)

Requested Modifications & Council Response leading to proposed modifications

Draft for Planning Policy Built Heritage Working Party

Schedule 3 - Requested Modifications & Council Response

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
LPS129	Mr John Edwards	9.1 Places & Sites - Introduction	Para 9.1.4	Para 9.1.4 the basis of the definition of settlement boundaries needs to be classified as it does not refer to topography or urban form. It appears to be simply a result of dwellings planned and, consequently, arbitrary.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>Para 9.1.4 provides general context on the purpose of such boundaries. The methodology used to review boundaries is included in separately published evidence documents and need not be included in the Plan.</p> <p>Conclusion No change proposed.</p>	No	
LPS435	Mrs Raj Bains, Boyer Planning (Richborough Estates)	9.2 Places & Sites - Site Allocations	Policy DS1	Promoting alternative site – Land at Paston Gateway (H0160) in replacement of NW62/A, as the Council have underestimated their housing target.	<p>Comments noted. The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting Site Assessment Booklets</p> <p>Conclusion No change proposed.</p>	No	
LPS234	Mrs Sarah Mitchell (RSPB)	9.2 Site Allocations	Policy DS1	Cromer and Sheringham should be included within HRA screening process due to their proximity to the Greater Wash SPA.	<p>The whole Plan including policy DS1 and the individual site allocations has been subject to HRA/ AA. Natural England through LPS762 confirm 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 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 policy DS1 and Cromer/ Sheringham sites allocations in relation to the Greater Wash SPA.</p> <p>Conclusion No change proposed.</p>	No	
LPS728	Mrs Debbie Mack (Historic England)	9.2 Site Allocations	Policy DS1	<p>Amend policies to include recommended wording from HIAs.</p> <p>Revisit supporting text and policy wording to ensure sufficient detail and consistent approach with respect to the historic environment.</p>	<p>The conclusions of the HIA have been taken into consideration in the selection and finalisations of the preferred site allocations and policy requirements. More detail can be found in the individual Site Assessment Booklets. The purpose of Policy DS1 is to allocate the Council's preferred sites. The Individual site allocation policies contain the necessary policy requirements in relation to the historic environment once all factors have been considered. Further comments made in relation to specific site policies are considered against each site where submitted.</p> <p>Conclusion No change proposed</p>	No	
LPS359	Mr Ollie Eyre, Deloitte (Church	9.2 Site Allocations	Para 9.20-9.29	Promoting alternative site in Ludham – Land South of Norwich Road & 8 smaller sites in Horning which were not considered previously.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The comment does not relate to the policy proposed and largely seeks to promote alternatives sites.</p>	No	

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	Commissioners for England)				<p>Alternative sites and options have been considered in the development of the HELAA, and the Local Plan, and previously been consulted on. More information can be obtained from the supporting Site Assessment Booklets.</p> <p>Conclusion No change proposed.</p>		
LPS112	Dr Victoria Holliday	9.2 Site Allocations	Policy DS1	<p>Designation of new homes for principal residency in coastal towns and villages.</p> <p>Provision of infrastructure (especially parking and health care) prior to development in Holt.</p>	<p>Comments noted. The purpose of Policy DS1 is to allocate the Council's preferred sites. The Council does not consider it necessary to amend the policy or Plan as proposed. The comment largely repeats previous comments under LPS 86/ 49. The issue of second homes, principal 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>A modification (PMIN/HC1/01) has been proposed in relation to lowering the threshold for Health Impact Assessments and Policy HC5 of the Plan provides for the delivery of necessary supporting infrastructure.</p> <p>Conclusion No change proposed.</p>		
LPS306	Mr Sam Hazell, Lawson Planning Partnership (White Lodge Ltd)	9.2 Site Allocations	Policy DS1	<p>Promoting alternative site in High Kelling – Former Four Seasons Nursery.</p> <p>In order to enable housing development that reflects local circumstances and needs and to make the Plan sound, it should be modified to identify site allocations for housing developments of appropriate scale at Small Growth Villages, to contribute to meeting local need (including affordable) and support local rural vitality and services viability, in accordance with the NPPF.</p> <p>High Kelling has a good range of services and is well related to the towns of Holt to the west, and Sheringham & Cromer to the northeast, via sustainable travel modes, and the principal road network.</p> <p>We request that the site at the Former Four Seasons Nursery, High Kelling, is allocated for residential development as set out in our letter of 18th June 2019 submitted in response to the Reg 18 consultation, attached. The site is located in a sustainable location, where it will support both existing services in the settlement of High Kelling and that of those nearby. This underused site forms part of the established village functionally and visually and has the potential to provide much needed housing, including making a meaningful contribution to the affordable housing need in</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Policy SS1 sets out how growth in High Kelling can accord with the Plan without the need to rely on specific site allocations.</p> <p>Conclusion No Change proposed.</p>	No	

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				the village. Our 2019 submission with attached feasibility layout demonstrates that this site can be laid out in a manner which respects the prevailing character of the area and the amenities of nearby adjacent properties. It is considered that this amendment would address the soundness objection.			
LPS471	Mrs Kirstie Clifton (Trinity College Cambridge) (Define Planning and Design)	9.2 Site Allocations	Policy DS1	It is proposed that the residential development capacity (site FO1B) should include a range from 350-560 dwellings (rather than just the upper limit as currently specified in the policy), plus 100 units of elderly care accommodation, open space and supporting infrastructure. In this way, the policy will avoid unnecessarily restricting the delivery of development across the majority of the site within the control of Trinity College Cambridge.	<p>Comments noted. This comment largely repeats concerns raised under the site-specific policy and contained in LPS472. A Modification is proposed under LPS472 (PMIN/11.1/01) for reasons of consistency. The Council agrees with the proposed modifications to the policy wording in regard to the inclusion of '100 units of elderly care provision' in order to be consistent with criterion 8 in the site-specific policy.</p> <p>The Council do not agree with the inclusion of a range of dwellings to be delivered on site as this provides uncertainty over how much growth could be achieved in the settlement and in the Plan-Period overall. Development of the site in phases in accordance with an agreed master plan would not restrict delivery of development across the majority of the site.</p> <p>Conclusion No change proposed.</p>	No	
LPS799	Mr Darl Sweetland (Anglian Water)	9.2 Site Allocations	Policy DS1	<p>Anglian Water is aware that Natural England (NE) are in the early stages of assessing the implications of growth in Norfolk on water quality at European level designated nature conservation sites. The water courses which NE may seek to require developers to show that their development would not add to nutrient pollution include the Wensum, Bure, Ant and Thurne. Sixteen of the 35 settlements identified for growth would be served by WRC which discharge treated wastewater into these water courses. If none of the developments at these locations could demonstrate Nutrient Neutrality, circa 1450 homes would need to allocate to other settlements and sites. This assumes that sites with existing planning permission/ already in construction could continue to be built.</p> <p>SUPPORT: In view of the current emerging position on nutrient neutrality Anglian Water recognises the need – in Policy F10, for example – for the Council to require:</p> <p><u>Enhancement to sewerage infrastructure should be undertaken prior to the first occupation of any dwelling to prevent detriment to the environment and comply with the Water Framework Directive obligations.</u></p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The requested modification to F10 is already included within Policy F10 (as criterion 10). A modification in relation to Nutrient Neutrality has also been proposed separately under PMAIN/CC13/01</p> <p>Conclusion: No change proposed.</p>	No	
LPS803	Mr Steve Kosky, Turley Planning (Pigeon Investment Management Ltd)	9.2 Site Allocations	Policy DS1	<p>Promoting alternative site in Cromer – Land at Runton Road/Clifton Park C10/1</p> <p>These representations conclude that in order for the Draft Local Plan to be found sound that it is strongly recommended that the promoted Site is reinstated as an allocation.</p> <p>This reinstated allocation will help to address the shortfalls arising from the significant compound number of delivery issues identified by these representations at a number of</p>	<p>The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets however, the site was discounted for a number of reasons not least due to wildlife concerns and landscape impacts, Coalescence concerns and SA considerations.</p> <p>Conclusion No Change proposed</p>	No	

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				<p>other strategic sites in Cromer, Fakenham and North Walsham.</p> <p>The Site can assist with these shortfalls by delivering approximately 55 new homes, including approximately 19 new affordable homes, together with Extra Care accommodation, on land south of the A149 and west of Clifton Park, in accordance with recommendations of Officers of the Council.</p>			
LPS521 LPS522 LPS523 LPS524 LPS256	Mr William Horner	10. Cromer	Policy C22/2	Promoting alternative site by third party (not landowner) in Cromer, located on western end of Cromer, Clifton Park C10/1.	<p>The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets however, the site was discounted for a number of reasons not least due to wildlife concerns and landscape impacts, Coalescence concerns and SA considerations.</p> <p>Conclusion: No change proposed.</p>	No	
LPS657	Mr Lyndon Swift (Weybourne Parish Council)	10. Cromer	Para. 10.0.8	The Plan should maintain existing access to the countryside.	<p>Comments noted. The Council does not consider it necessary to amend the Plan.</p> <p>All site-specific policies in the Plan include reference to improvements to landscape and biodiversity, and specific policies elsewhere seek improvements in connectivity and reference improving public footpaths and cycle routes to promote active travel. Work is underway separately with Norfolk County Council to produce an investment plan to improve walking and cycling access- NCC intend to hold further engagement on the emerging LCWIP which identifies priority routes and areas of investment in early 2023.</p> <p>No specific modification has been proposed</p> <p>Conclusion: No change proposed.</p>	No	
LPS602 LPS603 LPS604	Mr David Dewbery	10.1 Land at Cromer High Station, Norwich Road, Cromer	Policy C07/2	<p>Promoting alternative site by third party – Land West of Roughton Road (C19/1) in Cromer.</p> <p>As an alternative, there is another Site known as West of Roughton road, Cromer (C19/1) which should have been given more credibility during this plan process. This site has been favourably rated by the Council during site assessment and was only dismissed because Highways thought access was difficult. Since then, an alternative access has been identified and NCC Highways have confirmed it could not object and would support a development of around 85 -100 dwellings.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>A number of alternative options have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets. Site C19/1 was not considered for allocation due to several constraint issues that could not be mitigated, including impacts on the AONB, the quality of the highway network being unable to support large scale growth, and poor access to services and facilities when compared to other preferred sites. Whilst highway network issues may be addressed via smaller scale development other concerns remain in relation to impacts on the AONB and site location in relation to services.</p> <p>Conclusion: No change proposed.</p>	No	
LPS247	Julia Edwards, Corylus (Innova Property Ltd)	10.2 Former Golf Practice Ground, Overstrand Road, Cromer	Policy C16	To make plan sound: review SA/evidence base – our observations suggest sites south of Cromer are better located, without deliverability concerns and further from sensitive coastline and nearby village of Overstrand	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The most appropriate sites have been selected based on a thorough assessment of submitted sites in Cromer. More information can be obtained from the supporting site assessment booklets</p>	No	

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					Conclusion: No Change proposed.		
LPS486	Mr Mark Singer, Barton Wilmore (Sutherland Homes)	10.2 Former Golf Practice Ground, Overstrand Road, Cromer	Policy C16	<p>Propose alternative wording to Policy C16:</p> <ul style="list-style-type: none"> Land amount to approximately 6.4ha, as defined on the policies map, is allocated for development of approximately 150 dwellings and 60 units of elder care accommodation, public open space and associated on and off-site infrastructure. <u>The precise number of dwellings and elderly care accommodation will be determined with reference to up-to-date evidence around need and other site-specific considerations.</u> On Criteria 4. – On site delivery of not less than 1.31 hectares of sufficient multi-functional open space together with its ongoing maintenance. On Criteria 5. – Retention and enhancement, where possible, of hedgerows and trees around the site, including the protection of existing woodland within the site and the provision of a landscaped buffer along the northern and western boundaries. 	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The Policy sets a minimum requirement for open space requirement in line with the open space standards set out in policies elsewhere in this Plan. The requested modification would result in the setting of a lower policy threshold. Biodiversity and habitat creation are an important part of climate change resilience</p> <p>Conclusion No change proposed.</p>	No	
LPS690	Mrs Laura Joyce (Natural England)	10.2 Former Golf Practice Ground, Overstrand Road, Cromer	Policy C16	<p>Inclusion of new criteria in Policy C16</p> <p>In line with then Plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>	<p>The Council does not consider it necessary to amend the Plan as proposed. The Council HRA has undertaken an appropriate assessment. Policies elsewhere in the Plan require consideration of the AONB and its special qualities. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA /AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p>Conclusion No change proposed</p>	No	
LPS141	Miss Noami Chamberlain (Norfolk County Council - Highways)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	The allocation needs to be increased to include additional land further south of the proposed area and east of the A149 (Policy Map C22/2), enabling provision of an on-line roundabout at the south access from the site to the A149.	<p>Modification is proposed in order to facilitate the requirements of criterion 2 of this policy.</p> <p>Increasing the site boundary to accommodate the provision of highways improvements would not be a significant issue, given the wider land outside the current site boundary is within the same land ownership. (Revised Policies Map extract at Appendix 5)</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/10.3/01 & PMIN/10.3/02
LPS243	Julia Edwards (Brown & Co and Corylus Planning)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	<p>The boundary of the site should be increased to accommodate several concerns including:</p> <ul style="list-style-type: none"> Being able to provide the two required access points, including a new roundabout on the A149; 	<p>Additional land should be allocated to accommodate the provision of highways improvements, the Council has agreed to this proposed modification (see PMIN/10.3/01 above).</p> <p>It is not considered appropriate to further increase the site boundary to accommodate the other concerns raised due to the</p>	Yes	PMIN/10.3/01 & PMIN/10.3/02

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				<ul style="list-style-type: none"> Being unable to provide required landscape mitigation within the current site boundary to the south; Routes would need to be made through Beckett's Plantation to connect the two sides of the site, though this is contrary to the site-specific policy's requirement to protect the plantation; The site policy requires a new footpath connection to Roughton Road, however the site boundary only abuts residential dwellings on Roughton Road with no possible access to the road itself. 	<p>site's location within the AONB and the Council's intention to limit impact on the AONB as much as possible. Footpath links would be on land in the control of the site promoter and need not be allocated in order to secure delivery.</p> <p>Conclusion No change proposed.</p>		
LPS281	Miss Jane Gardner	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	Creating an accessible and continuous pathway on the west side of the Norwich Road will be required for complete safe access to the development for people.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy under Criteria 1 already includes the requirement for new segregated cycle and pedestrian footways to serve the site.</p> <p>Conclusion No change proposed.</p>	No	
LPS505	Mr Mike Jones (Norfolk Wildlife Trust)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	<p>Due to the proximity to existing woodland on site, Beckett's Plantation, we recommend that the following is added to the policy text.</p> <p><u>'In order to help buffer the existing woodland on site from indirect impacts from new housing, a stand-off distance of at least 20m should be secured from any new built development. It is recommended that delivery of Biodiversity Net Gain includes an element of natural vegetation to buffer the existing woodland edge, preferably through natural regeneration from the woodland'.</u></p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>There is already a policy requirement in C22/2 which references the protection of Beckett's Plantation and providing appropriate mitigation for biodiversity and landscape impacts. The need for a buffer, and its size, is a matter which can be considered at application stage when the mix and layout of land uses within the site is known.</p> <p>Conclusion No change proposed.</p>	No	
LPS730	Mrs Debbie Mack (Historic England)	10.3 Land West of Pine Tree Farm, Cromer	Policy C22/2	<p>Amend criterion 15 to read:</p> <p><u>Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including Pine Tree Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</u></p> <ul style="list-style-type: none"> <u>Retain and strengthening hedges/ trees around and within the site</u> <u>and incorporating tree planting within the site</u> <u>Introducing a landscape buffer to the southern boundary</u> <u>landscaped buffer along the western boundary of the site</u> <u>Dwellings of one or one and a half storey height on the southernmost part of the site.</u> <p>Amend HIA to include new site area.</p> <p>The southern part of the site should be left open for open space, sports provision and allotments with careful landscaping along the eastern edge of the site to protect Pine Tree Farm. These requirements should also be included in the policy.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>Bullet point 1 - In regard to retain/strengthening hedgerows and trees around the site, this requirement is already included in the policy as Criterion 8.</p> <p>Bullet point 2 - is already included in the policy as Criterion 8.</p> <p>Bullet point 3 - the western boundary of the site abuts residential development, providing a landscape buffer would not benefit the wider landscape due to the already existing development.</p> <p>Bullet point 4 - this would limit the possible masterplanning on the site and could impact on other areas of site if such a restriction was in place, would discourage mixed house types in the design of the site. The Policy already requires the impacts on the AONB to be addressed.</p> <p>Conclusion No Change proposed.</p>	No	
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<p>Amend Policy F01/B to read:</p> <p>Land amounting to 26.5 hectares <u>including 5.05 hectares of existing sporting uses</u>, as defined on the policies map, is allocated for residential development of <u>between 350 and 560 dwellings, 100 units of</u> elderly persons accommodation,</p>	<p>Comments noted, a modification is proposed for reasons of consistency. The Council agrees with the proposed modifications to the policy wording in regard to the inclusion of '100 units' in order to be consistent with criterion 8 in the site-specific policy.</p>	Yes	PMIN/11.1/01

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				public open space, and associated on and off-site infrastructure.	The Council do not agree with the inclusion of a range of dwellings to be delivered on site as this provides uncertainty over how much growth will be achieved in the settlement and in the Plan-Period overall. Conclusion Agree to requested modification (part).		
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Amend Criterion 1: The submission, approval and implementation of a comprehensive masterplan to address access and sustainable transport, layout, landscaping, phasing and conceptual appearance; 	Comment noted, a modification is proposed for reasons of providing further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies. Conclusion Agree to requested modification.	Yes	PMIN/11.1/02
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Amend Criterion 2: The submission, approval and implementation of a comprehensive access strategy and Transport Assessment providing for safe and convenient access to the A148, together with any necessary junction improvements along the length of Fakenham by-pass including at the A148/B1105 and A148/A1065 junctions; 	Comment noted, a modification is proposed in order to provide further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies. Conclusion Agree to requested modification.	Yes	PMIN/11.1/03
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Amend Criterion 3: Appropriate provision of off-site mains water reinforcement; 	Comments noted, a modification is proposed for reasons of providing further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies. Conclusion Agree to requested modification.	Yes	PMIN/11.1/04
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Amend Criterion 5: Retention or replacement of existing sporting uses totalling circa 5.05 hectares including the rugby club and sports centre; 	The Council does not consider it necessary to amend the policy as requested. The Policy is clear in its requirement to replace existing recreational facilities in the event that they are developed and there is no need to specify quantity. Conclusion No change proposed.	No	
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Amend Criterion 6: On site delivery of multi-functional open space to reflect allocated and/or retained uses in accordance with Open Space Standards set out in Appendix 2 of the Plan; 	The Council does not consider it necessary to amend the Plan as proposed. The Policy sets a minimum requirement for open space requirement and reinforces the requirements around open space standards set out in policies elsewhere in this Plan. The mix of provision between retention of existing and replacement can be determined via the required Master Plan for the site and subsequent planning applications. Conclusion No change proposed.	No	
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Remove Criterion 7: Submission, approval and implementation of the findings of a health impact assessment; 	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The criterion reinforces the policy requirement of HC1 and is considered an important consideration in the overall allocation. Modifications suggested elsewhere would lower the site size threshold for Health Impact Assessments meaning that the proposed scale of development on this site would require such an assessment. Conclusion	No	

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					No change proposed.		
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Criterion 8: The submission and approval of a development phasing plan which demonstrates the delivery of all aspects of the allocated and/or retained uses, including not less than 100 units of specialist elderly persons accommodation; 	<p>Comments noted, a modification is proposed in order to provide further clarity of the requirements set out in the site-specific policy and to remain consistent with other policies.</p> <p>The phrase 'demonstrate' instead of the currently in-place 'ensures' does not guarantee site specific requirements will be delivered so is not agreed.</p> <p>Conclusion Agree to requested modification (part).</p>	Yes	PMIN/11.1/05
LPS472	Mrs Kirstie Clifton, Define Planning (Trinity College Cambridge)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	<ul style="list-style-type: none"> Criterion 10: Demonstrate that there is adequate capacity in road, drainage and educational infrastructure taking account of existing planned growth 	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Policy as drafted is sufficiently clear.</p> <p>Conclusion No change proposed</p>	No	
LPS691	Ms Laura Joyce (Natural England)	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	In line with then Plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. This allocation is also located within or in close proximity to the Norfolk Coast AONB. Due consideration should be taken to determine any adverse effects on the special qualities of the protected landscape. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.	<p>The Council does not consider it necessary to amend the Plan as proposed. The Council's HRA has undertaken an appropriate assessment and LSE have been ruled out in relation to urban, hydrological and recreational effects The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA /AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p>Conclusion No change proposed</p>	No	
PC075	North Norfolk District Council	11.1 Land North of Rudham Stile Lane, Fakenham	Policy F01/B	Criteria No. 5 of the Policy makes reference to retention or replacement pitches, but should also ensure that any possible replacements are of a better or equivalent value to the existing.	<p>Comments noted. The Council agrees to the proposed modification.</p> <p>Conclusion No change proposed</p>	Yes	PMIN/11.1/06
LPS506	Mr Mike Jones (Norfolk Wildlife Trust)	11.2 Land Adjacent to Petrol Filling Station, Wells Road, Fakenham	Policy F02	We recommend that the policy wording is updated to include reference to the need for an ecological assessment as part of any application.	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The requirement for ecological Assessment is covered elsewhere in the Plan.</p> <p>Conclusion No change proposed</p>	No	
LPS63	Ms Laura Joyce (Natural England)	11.2 Land Adjacent to Petrol Filling Station, Wells Road, Fakenham	Policy F02	<p>Inclusion of new criteria in Policy F02:</p> <p>The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p>	No	

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				provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Conclusion No change proposed		
LPS694	Ms Laura Joyce (Natural England)	11.3 Land at Junction of A148 and B1146, Fakenham	Policy F03	Inclusion of new criteria in Policy F03: The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.	No	
PC076	North Norfolk District Council	11.3 Land at Junction of A148 and B1146, Fakenham	Policy F03	Consistent wording regarding policy compliance is missing from policy, only policy in plan not to have this wording.	Comments noted. Council agrees to the proposed modification for consistency with other policies in the Plan. Conclusion No change proposed.	Yes	PMIN/11.3/01
LPS507	Mr Mike Jones (Norfolk Wildlife Trust)	11.4 Land South of Barons Close, Fakenham	Policy F10	The river and its floodplain are major green infrastructure assets for the Fakenham and the district and we recommend it is retained as green space.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Criterion 5 already identifies the land adjacent to the river as green space and as an area not appropriate for residential development. Conclusion No change proposed.	No	
LPS696	Ms Laura Joyce (Natural England)	11.4 Land South of Barons Close, Fakenham	Policy F10	This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation also borders ditches that, subject to modifications, will discharge into the River Wensum SSSI and SAC. Water pollution is a contributing factor to the unfavourable condition of the River Wensum SSSI and SAC, as explored in the Site Improvement Plan. And so, in line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to consider appropriate drainage strategies and determine no likely significant effects on nearby designated sites.	Comments noted. Criteria 7 of Policy F10 already includes the requirement that addresses this issue. The Council's HRA concludes that the allocation policy wording is sufficient for it to conclude no adverse effects on integrity alone or in combination at plan level. Conclusion No change proposed.	No	
LPS509	Mr Mike Jones (Norfolk Wildlife Trust)	12.1 Land North of Valley Lane, Holt	Policy H17	To ensure that this allocation will not lead to deterioration of the CWS, the policy wording should be updated to make reference to the adjacent CWS, to ensure that any site design leaves a sufficient buffer between the site and the CWS to avoid indirect impacts from residential properties and for sufficient measures to be included in any planning consent to ensure that visitor pressure impacts on the CWS are mitigated for. Due to proximity to the CWS, we also recommend that the policy wording makes clear that any proposal here will need to be accompanied by a detailed ecological assessment.	Comments noted, Modification is proposed to reference 'County Wildlife Site' in Criterion 2 for clarity, reflecting the designation which applies to Spout Hills and to ensure appropriate attention is given to the presence of a CWS. The requirement for an ecological assessment will be assessed at the application stage, and it is not considered necessary to add this to site-specific policy requirements. Conclusion Agree to requested modification (part).	Yes	PMIN/12.1/01
LPS731	Mrs Debbie Mack (Historic England)	12.1 Land North of Valley Lane, Holt	Policy H17	Replace Criterion 1 with: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Holt Conservation Area, Hill House, Methodist Church, both Grade II Listed Buildings. Development should include the	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Bullet point 1. The proposed development is located to the rear of existing dwellings which already impact on views of the Glaven Valley,	No	

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				<p>following mitigation measures (as set out in further detail in the Heritage Impact Assessment):</p> <ul style="list-style-type: none"> - Seek to retain a view toward the Glaven Valley from Norwich Road - Retain and strengthen hedgerow on the eastern boundary of the site, particularly on the north eastern corner to mitigate potential impact upon Hill House and the Methodist Church. - Provide strong landscaping along the southern and northern boundaries of the site - A Heritage Statement is required to assess the archaeological importance of the site. 	<p>Bullet point 2. There is already a requirement in Policy H17 under criterion 3 to retain and enhance mature hedgerows and trees around the site.</p> <p>Bullet point 3. There is already a requirement in Policy H17 under criterion 2 to provide appropriate landscaping to soften the development edge with Spout Hill CWS.</p> <p>Bullet point 4. This requirement is already set out in Policy ENV7.</p> <p>The requirements for archaeological assessments are addressed elsewhere in the Plan.</p> <p>Conclusion No changes proposed.</p>		
LPS697	Ms Laura Joyce (Natural England)	12.1 Land North of Valley Lane, Holt	Policy H17	<p>This policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p>Conclusion No change proposed</p>	No	
LPS142	Miss Naomi Chamberlain (Norfolk County Council - Highways)	12.2 Land at Heath Farm, Holt	Policy H20	<p>The following revision is required to point 1 of policy H20 'Access being delivered off Nightjar Road <u>and existing new</u> A148 roundabout...'</p>	<p>Agree. Modification is proposed for reasons of clarification.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/12.2/01
LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<p>Insert into the Site-specific policy requirements <u>on</u> the need to provide a 1.3 hectare wide landscape buffer along the east and south-east boundary of the site.</p>	<p>Comments noted, a modification is proposed to improve the effectiveness of the Plan to ensure deliverability of the site and the Plan as a whole.</p> <p>Insert new criterion: 'Development proposals should provide a landscape buffer long the east and south-eastern boundary of the site of approximately 1.3 hectares.'</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/12.2/02
LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<p>Proposed modification to Policy H20 Criterion 1: Access being delivered off Nightjar Road and new A148 roundabout and delivery <u>a</u> of footpaths-connections-to footpath FP9a</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. It is an existing public right of way, Unnecessary change to policy.</p> <p>Conclusion No change proposed.</p>		
LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	<p>Proposed modification to Policy H20 Criterion 3: Submission of a Transport Statement identifying sustainable traffic mitigation measures. <u>Reasonable endeavours will be used to scope out the feasibility of the delivery</u> of enhanced pedestrian improvements across and along the A148 to facilitate pedestrian access to the medical centre, and bus stops on Cromer road and the east side of the town.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Using terms such as 'reasonable endeavours' and 'feasibility of delivery' lacks certainty.</p> <p>Conclusion No change proposed</p>		

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LPS333	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.2 Land at Heath Farm, Holt	Policy H20	On-site provision of minimum of 1.55 ha open space; <u>Open space will be delivered in accordance with the standards set out in the Local Plan.</u>	Comments noted, final form and quantity of development on the site is influenced by strategic landscape buffer, gas pipeline crossing the site, access and relationship with adjacent uses. It is accepted that at this stage it is difficult to quantify precise requirements for open space. Revised wording ensuring compliance with adopted standards having regard to final development scheme at application stage is appropriate . Conclusion Requested modification recommended.	Yes	PMIN/12.2/03
LPS732	Mrs Debbie Mack (Historic England)	12.2 Land at Heath Farm, Holt	Policy H20	Propose modification to Criterion 2: Remove wording and replace with the following: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Heath Farm House and Barn North of Heath Farm House, both Grade II Listed buildings. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> • Further landscaping to be provided along the north western boundary of the site • Landscaping along the southern boundary of the site • Low density and single storey development to the southern, northern and western parts of the site • Open space to be located within the south eastern part of the site and strong landscaping to be provided along the south eastern boundary of the site to provide a buffer between residential development and Heath Farm and Heath Farm Barn 	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The first sentence is covered by Policy ENV7. Bullet point 1. The term ‘further landscaping’ is vague, and Criterion 2 of the site-specific policy already covers the provision of appropriate landscaping to mitigate impacts on Heath Farm. Bullet point 2. This is already being addressed through another proposed modification to the policy by the landowner – see LPS333 (PMIN/12.2/0.1) Bullet point 3. This will have an impact on the number of dwellings and building type being delivered on site and may impact on the delivery of other necessary required infrastructure. The form of development, its impact on heritage assets and the need or otherwise for single storey buildings can be considered at application stage. Bullet point 4. Repeat of second bullet point. The issue is being addressed by landowner. Location of open space will be determined through the application process. Conclusion No change proposed.	No	
LPS732	Mrs Debbie Mack (Historic England)	12.2 Land at Heath Farm, Holt	Policy H20	Add heritage mitigation diagram from p 332 of HEP to Plan.	Comment noted. The Council does not consider it necessary to amend the Plan as proposed. The policy appropriately addresses heritage concerns through the site-specific policy requirements. A modification in relation to landscaping has also been proposed in response to LPS333. (PMIN/12.2/02) Conclusion No change proposed		
LPS699	Ms Laura Joyce (Natural England)	12.2 Land at Heath Farm, Holt	Policy H20	This policy support developments which may result in an increase in recreational use of and urban effects on designated sites. We recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites and support the mitigation measures highlighted in the HRA.	Comments noted. Criteria 10 of Policy H20 already includes the requirement that addresses this issue the Council’s HRA concludes that the allocation policy wording is sufficient for it to conclude no adverse effects on integrity alone or in combination at plan level. Conclusion No change proposed.	No	
LPS335	Jack Millar, Strutt & Parker (North Norfolk Tomatoes) Mr Alistair Brown	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	Proposed modification: To remove the proposed allocation from the Local Plan as the landowner confirms the site is no longer available for development and does not have a realistic prospect of	Comments noted, a modification is proposed to remove the site as it is no longer available and deliverable. Further discussions with the landowner have confirmed his desire to remove this site from the Local Plan’s proposed allocations.	Yes	PMIN/12.3/01

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				delivering the required growth within the timeframe of the Plan.	Conclusion Agree to requested modification.		
LPS143	Miss Naomi Chamberlain (Norfolk County Council - Highways)	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	<p>Policy H27/1, point 2 refers to a new roundabout at the A148, this is an existing junction. Clarification is required as the Highway Authority would not wish to support an additional junction at the A148.</p> <p>The following revision is required 'Access being delivered off Nightjar Road and existing A148 roundabout and no access from Hempstead Road.'</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The site is no longer available for development as per modification PMIN/12.3/01.</p> <p>Conclusion No change proposed.</p>	No	
LPS510	Mr Mike Jones (Norfolk Wildlife Trust)	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	<p>Section 6.19 of the HRA notes that the potential for hydrological impacts on the Norfolk Valley Fens SAC remains from this allocation. We are concerned that an adverse effect on the SAC has been ruled out in the HRA through deferral to project level HRA.</p> <p>Whilst a project level HRA may be able to demonstrate avoidance of adverse effects at the planning application stage, insufficient evidence has been provided at this stage to definitively rule out adverse effects, and so the inclusion of this employment allocation. This means there remains a risk to the delivery of the plan if project level HRAs are unable to demonstrate that adverse effects on the SAC will be avoided.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. A project level HRA is the appropriate mechanism due to the potential for a variety of uses and schemes. The site is however removed from the Plan as is no longer available for development as per modification PMIN/12.3/01.</p> <p>Conclusion No change proposed.</p>	No	
LPS733	Mrs Debbie Mack (Historic England)	12.3 Land at Heath Farm, Holt (Employment)	Policy H27/1	<p>The policy needs amending to incorporate the wording from the Heritage Impact Assessment.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>Replace criterion 1 with: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Heath Farm House and Barn North of Heath Farm House, both Grade II listed buildings and the Glaven Valley Conservation Area.</p> <p>Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> • Retain and strengthen landscaping along the southern boundary of the site • Retain and strengthen landscaping along the eastern boundary of the site • Retain prominent trees to the west • Provide a strong landscaping buffer on the northern boundary of the site • Smaller scale development to the south and south eastern parts of the site 	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The Conclusions of the HIA have been taken into consideration in the selection and finalisations of the preferred site allocations and policy requirements. More information can be found in the site assessment booklets. The site is no longer available for development as per modification PMIN/12.3/01.</p> <p>Conclusion No change proposed.</p>	No	
LPS34	Mrs Kerry Walker	13 Hoveton	13.1	<p>Proposed modification: flood modelling and incorporate into future development plans for commercial centre.</p> <p>NNDC must use traffic flows, air pollution and bridge life span to support a whole settlement approach. Currently the plan for Hoveton does not measure from a whole settlement position,</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>Commercial centre is not being provided for as part of the site allocation. The Policy includes reference to the Wroxham and Hoveton Network Improvement Strategy Action Plan.</p> <p>Conclusion No change proposed.</p>	No	

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LPS264	Mr Geoff Cook	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	The number of houses required needs to be accurate - is it 120 including the care home or 120 plus the care home and if so, how many in the care home. Account needs to be taken of the recent developments at Church Farm (25) and Tilia Park (28) The brownfield site off Station Road needs to be assessed	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The quantum of development on site is 120 in addition to the provision of specialist elder care. Other sites, both with permission and future capacity have been considered when preparing the Plan. Conclusion No change proposed.	No	
LPS615	Cllr Nigel Dixon (NNDC Ward Member for Hoveton & Tunstead)	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	The development must deliver a new strategic solution to the current persistent overwhelming of the existing foul water network in Hoveton and the regular incidents of raw sewerage flooding in several parts of Hoveton caused by inundation by surface/river water ingress and routing all foul water through the Hoveton village centre. • The development must include a mini roundabout junction on Tunstead Rd aligning with the entrance to Two Saints Close to create safer access to both estates and to help moderate excessive speed of traffic leaving and entering Hoveton. • The density of the development must be in keeping with the majority of Hoveton and include substantial areas for wildlife habitat, conservation and biodiversity gain. This includes minimising the destruction of the highly valued and habitat rich Hawthorne hedge along Tunstead Rd and replanting the lost section along the north side of the site joining up with the roadside hedge. • The development must deliver traffic solutions to improve flow capacity for vehicles, cyclists and pedestrians as well as air quality in the village centres of Hoveton and Wroxham. This includes setting aside the heavily discredited and abortive Wroxham & Hoveton Network Improvement Strategy Action Plan and starting afresh with an open evidence based strategic approach with full community involvement. • The development must ensure greater capacity and reduced waiting times at Hoveton and Wroxham Medical Centre and access to local NHS Dentistry.	Agreed The proposed main modification to enlarge the site and increase the number of dwellings is intended to ensure development viability and allow for the issues identified to be comprehensively addressed. Conclusion Update policy criteria to require comprehensive drainage strategy, limit numbers of dwellings on enlarged site to no more than 150, include junction improvements in Tunstead Road and require Transport Assessment to consider and address off site highway impacts.	Yes	
LPS545, LPS547, LPS544, LPS546	Mr Alastair Curran, Planning Places Ltd (FW Properties)	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	It is considered that the original quantum of development be reinstated, alongside the small area of land to the north of the site be included in the allocation. This would ensure the allocation is not only sound but can deliver substantial public benefits quickly for the existing residents of Hoveton. Furthermore, wording regarding potential solutions to the foul drainage issue could also be incorporated into the allocation policy text, securing a more sound strategy.	Comments noted, a modification is proposed in order to improve the effectiveness of the Plan. Additional land will assist in the provision of requirements set out in the site-specific policy. Conclusion Agree to requested modification.	Yes	PMIN/13.1/01
LPS734	Mrs Debbie Mack (Historic England)	13.1 Land East of Tunstead Road, Hoveton	Policy HV01/B	Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Wroxham Bridge and the Grade II* Listed Church of St. Peter. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): • Retain and enhance landscaping on the northern and southern boundaries of the site • Retain strong landscaping on the western boundary of the site	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. These points are already addressed within the site-specific policy for HV01/B. Conclusion No change proposed.	No	

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				<ul style="list-style-type: none"> Lower density, single storey dwellings on the northern part of the site 			
LPS37	Mr Michael Rayner (The Battlefields Trust)	14 North Walsham	Para 14.03-14.15	<p>To ensure soundness of the Plan we suggest adding reference to this heritage asset elsewhere in the draft plan as follows:</p> <p>14.0.3 Add the following: North Walsham has the non-designated heritage asset of the North Walsham Battlefield site.</p> <p>14.1.5 Add the following bullet point: the non-designated heritage asset of the North Walsham Battlefield site.</p> <p>This would ensure the Plan sets out a positive strategy for the conservation and enjoyment of the historic environment in line with para. 190 of the NPPF. By including these additional references to the 'Battlefield site' it would ensure consistency within the Local Plan and with national policy.</p>	<p>Comments noted, a modification is proposed for reasons of clarity for para 14.1.5. The change is a minor modification in the supporting text for policy NW01/B. Proposed change to 14.0.3 is unnecessary as the paragraph is referring to constraints relating to designated/significant landscape assets which the battlefield site is not.</p> <p>Conclusion Agree to requested modification.(part)</p>	Yes	PMIN/14.1/01
LPS163	Miss Naomi Chamberlain (Norfolk County Council - Minerals & Waste)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019.</p> <p>'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'</p>	<p>Comments noted, a modification is proposed for reasons of consistency with other site-specific policies in the plan with this requirement, and to remain consistent with advice.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/14.1/02
LPS144	Miss Naomi Chamberlain (Norfolk County Council - Highways)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>Policy NW01/B must include a requirement to undertake a Transport Assessment to include the A149 / B1150 traffic signal junction and implement any agreed mitigation measures.</p>	<p>Comments noted, a modification is proposed for reasons of consistency with other site-specific policies in the plan, and for adherence to consultee advice. The following criterion should be included within the policy:</p> <p><u>"A transport assessment should be undertaken to identify possible mitigation measures, if necessary, for the A149/B1150 and wider transport network"</u></p> <p>Conclusion Agree to requested modification.</p>		PMIN/14.1/03
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>Supporting text at paragraph 14.1.5 states that the site is subject to an Area based Tree Preservation Order. The TPO is, at the time of writing, in draft form, and a rather blunt instrument to restrict tree loss on the site. Engagement with the District Council's Tree Officer is being undertaken to refine the TPO to better reflect the arboricultural condition of the site, following survey work undertaken in 2021. This part of paragraph 14.1.5 is not justified by evidence, and is therefore not consistent with Paragraph 35(b) of the NPPF.</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed. TPO issues can be considered at application stage.</p> <p>Conclusion No proposed change.</p>	No	
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	<p>Supporting text at paragraph 14.1.5 also states that the off-site mains water reinforcement and enhancement to the foul sewerage capacity will be required. As part of the emerging development proposals, Anglian Water have prepared a pre-planning assessment report to guide the foul water drainage strategy. In this report, included at Appendix A of this representation, Anglian Water state that the North Walsham Water Recycling Centre has capacity to treat additional flows from the development of the site. This element of the supporting text, and Part 7 of the policy, should therefore be amended to recognise the latest position in the local area. Without this acknowledgement, the paragraph fails to recognise the latest</p>	<p>Comments noted. The requirement relates to the foul water drainage <i>network</i> rather than the capacity at the waste Water Treatment Centre . No modification required.</p> <p>Conclusion No proposed change</p>	No	

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				evidence received from the statutory undertakers, causing non-conformity with Paragraph 35(b).			
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Part 9 of the Policy requires not less than 100 units of specialist elderly persons accommodation to be provided on site, in accordance with Policy HOU2. As described at paragraphs 2.16-2.20 of this representation, Policy HOU2 should be amended to omit the arbitrary care provision requirements included within the policy at present. Furthermore, market and local demands may determine that a facility comprising 100 units of accommodation is not viable at the site, so NW01/B requires flexibility in this aspect of the policy.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The requirement for elderly person's accommodation is evidence-based and reasonable any changes can be dealt with at application stage. Viability issues are adequately addressed in Policy HC5. Conclusion No change proposed.	No	
LPS450	Mr Jake Lambert, Bidwells (Hopkins Homes)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	The requirement at Part 4 of the policy should be refined as detailed below: Provision of a landscape buffer of an offset of no less than 6 metres between the development site and the existing properties at Norwich Road and Nursery Drive;	Comments noted. Modification is proposed. Conclusion Agree to requested change	No	PMIN/14.1/05
LPS513	Mr Tom Parish, Savills (JN Tofts)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Transport Infrastructure The Local Plan should be modified to set out clearly the transport infrastructure requirements to adequately facilitate the proposed development, ensuring this work is undertaken in a sequential manner if the development is phased.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Policy NW01/B achieves this already in conjunction with the larger site Policy NW62/A, which identifies transport mitigation measures. Conclusion No change proposed.	No	
LPS513	Mr Tom Parish, Savills (JN Tofts)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Drainage The current policy drafting is weak in respect of the obligation, design and execution of the works required to mitigate the impact upon the adjacent property. The policy should be amended to ensure adequate measures, designed to facilitate the entire development are considered implemented at all stages of the process. Communication and engagement are a vital aspect of this, neither of which have been effective to date.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This matter can be addressed at the application stage, through appropriate discussions over masterplanning of the site. Conclusion No change proposed.	No	
LPS735	Mrs Debbie Mack (Historic England)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Replace criterion 1 to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> • Retain and enhance landscaping along the southern, south western and north eastern boundaries of the site • Retain the hedgerow along the northern boundary of the site along Nursery Drive • Retain the strong hedgerows and trees within the centre of the site • Lower density, single storey development to be located to the south of the site 	Comments noted. Agree to proposed modifications in part and have been dealt with already by NNDC, see proposed modification PMIN/14.01/05 below in relation to NNDC PC079. Conclusion No change proposed.	No	
PC079	North Norfolk District Council	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	Update policies relating to Heritage Impact mitigation to be fully in line with the mitigation options put forward in the HIA and Site Assessment Booklet.	Comments noted. Agree to proposed modification. Conclusion Agree to requested modification	Yes	PMIN/14.1/06

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
LPS704	Ms Laura Joyce (Fh27/1)	14.1 Land at Norwich Road & Nursery Drive, North Walsham	Policy NW01/B	We recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The Council's HRA identified the potential for recreational impacts at screening stage. The policy includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 Conclusion No change proposed	No	
LPS65 LPS66	Dr Bianca Finger-Berry	14.2 Employment: Land East of Bradfield Road (NW52)	Para 14.2.1 Policy NW52	<p>Presentation in the local plan of NW52 as employment land is misleading, it is written as if it had already been allocated, rather than being a new proposal for consideration which was not detailed in any of the previous local plans.</p> <p>NW52 should not be designated as employment land as no review of current employment land has taken place and no need for additional employment land has been evidenced.</p> <p>An alternative for lorries to get to the industrial estate, such as lowering the Cromer Road so that high vehicles can go under the bridge should be given consideration to.</p> <p>No case has been made for the need of additional employment land. No review of existing employment land appears to have been done, as set out in government documents Employment Land Reviews (publishing.service.gov.uk).</p> <p>No new employment land should be designated whilst current land is not used in line with current permissions. A large proportion of current employment land is used for storage of redundant farm vehicles and lorries for which no permission exists. In addition, other parts of the land are used for storing rubble and crushing which has already led to noise complaints and the land is an eyesore. This use of employment land has not provided any additional employment for the local area. Current use of land, loss of a local amenity such as a campsite, and use and character of surrounding areas have not been taken into account when considering the allocation of this land.</p> <p>Further development of that land which will go up to a quiet lane will have a negative impact on the local countryside used by walkers, cyclists and horse riders. The land is unsuitable for employment land and the road.</p> <p>The sustainability assessment concludes it would have a negative impact and no reasons are given as to why this assessment should be ignored.</p> <p>The area should not be designated as employment land for the only purpose of enabling a road to be built at some future point.</p> <p>If a road was needed to link to the industrial estate, this should avoid properties if possible and provide the most direct link to the industrial estate as set out as the northern</p>	<p>Comments noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The need for additional employment land is evidenced and supported by an up-to-date quantitative and qualitative assessment through the Growth Sites Delivery Strategy 2021 and Background paper 3. The study reviewed a range of scenarios and concluded that a higher quantum of employment land would be required to ensure flexibility within the market and that any upturn in the market would be satisfied over the plan period. The Plan will increase the supply of undeveloped employment land in the District to 71.49 hectares (with 22.63 hectares of that supply in North Walsham), providing an increased supply in each area of the District, delivering choice and flexibility and meeting the identified development and future needs. The rationale for the allocation of this site is that it supports the requirement for access improvements from Bradfield Rd and connections over the railway to the Western extension. The proposal facilitates comprehensive development and addresses existing HGV circulation issues</p> <p>Consideration of alternative options have been given throughout the production of this plan.</p> <p>Conclusion No change proposed.</p>		

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				<p>extension in previous papers such as P.15 https://www.north-norfolk.gov.uk/media/6315/north-walsham-western-link-road-feasibility-study-main-report.pdf.</p> <p>No reasons have been set out as to why the proposed link road is now following a much longer route past more properties impacting negatively on local residents and walking routes.</p> <p>A road built there would have a negative Impact on local wildlife – there is a Jubilee Wood adjacent to the site with evidence of bats, deer, hares and newts.</p> <p>The site is also unsuitable for development as the domestic water supply for the local houses passes under the land, there is concern about interruption and contamination of the local water supply to the settlement on the end of Lyngate Road.</p> <p>The bridge is unsuitable for lorries to pass, this road leading from the countryside into North Walsham and a local supermarket is used by walkers, cyclists and horses and it would be unsafe for them to use the road and cross the bridge alongside lorries. No consideration has been given to the impact of the increase in traffic which would be using the road to go to Knapton and Mundesley as well.</p> <p>M - Not allocated NW52 as employment land Give considerations for an alternative to lorries reaching the industrial estate.</p>			
LPS10	Mr. Colin Hayward	14.2 Employment: Land East of Bradfield Road (NW52)	Policy NW52	<p>The NW52 is on rural countryside agricultural land owned by Scrap and Waste company seeking to profiteer from the destruction of the rural countryside and destruction of the rights of rural residents from the right to private and quiet life. The existing site operated by these owners have continuously failed to comply with County operation rules, have had massive fires and been subject to multiple complaints for noise disturbance. Such a development will increase heavy vehicle traffic on North Norfolk quiet lanes. If there is any industrial development this should be undertaken on the opposite side of the railway line where road access is better and away from residential land, for example off the Cromer Road near Waitrose.</p> <p>Not to extend the existing Cornish way site - But if it were to be extended ensure that Cornish Site development to only progress if new road from Cromer Road over railway line is constructed.</p> <p>NW52 for office premises only, NOT heavy industry such as waste management, vehicle dismantling, cement works, lorries etc. Also, there is a need to be mindful of the high pollution from the industrial site today with spotlights across fields into private dwelling. Such development to be subject to no light being visible beyond the boundaries of the site with all lights off after business hours.</p>	<p>NW52 was presented as an alternative option at Regulation 18 stage. In response to that consultation, NW52 was added to provide additional employment land. This site supports the requirement for access improvements from Bradfield Rd and connections over the railway to the Western extension and facilitates comprehensive development and addresses existing HGV circulation issues</p> <p>Conclusion</p> <p>No change proposed</p>	No	N/A

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				Access must be from Cornish Way only, or from new road from Cromer Road and Lyngate Road / Bradfield road to be closed to HGV vehicles and for access only for other vehicles. Also please be mindful that 4 properties on Lyngate Road have private mains water pipes across NW52 and this supply would have to be safeguarded in the event of any development.			
LPS705	Ms Laura Joyce, Natural England	14.2 Employment: Land East of Bradfield Road (NW52)	Policy NW52	<p>Sound – Subject to project level HRA where appropriate.</p> <p>In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal. Priority habitats and species should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.</p>	<p>Comments and support noted. The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The plan wide HRA screens out likely significant effects on European sites from the implementation of this policy.</p> <p>Conclusion No change proposed</p>	No	N/A
PC080	NNDC	North Walsham 14.2 Employment: Land East of Bradfield Road (NW52)	Para 14.2.1	For consistency the paragraph numbering should start after the heading 'Description' not before the explanation text above the site plan.	<p>Comment noted, A modification is proposed for reasons of consistency.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/14.2/01
LPS72 LPS83	Dawn Moore Mr Paul Harris (Broadland District Council)	14.3 Land West of North Walsham	Section 14.3	<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 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 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</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 not objected to by the County Council as Highway Authority. The approach is supported by transport assessments undertaken in cooperation with the Highways Authority and their consultants (WSP).</p> <p>Further detailed worked has been commissioned.</p> <p>Modification is proposed to Policy NW62/A for reasons of clarity. Add additional criterion under the 'Sustainable Transport' heading – <u>'14. Submission and implementation of a Transport Assessment to include consideration of the impacts (with mitigation required) on the surrounding network including the route to Norwich via Coltishall.'</u></p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/14.3/01

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				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.			
LPS144	Miss Naomi Chamberlain, Norfolk County Council - Highways	14.3 Land West of North Walsham	Policy NW62/A	Policy NW01/B must include a requirement to undertake a Transport Assessment to include the A149 / B1150 traffic signal junction and implement any agreed mitigation measures.	Comments noted, a modification is proposed for reasons of consistency with other site-specific policies in the plan, including NW01/B, and for adherence to consultee advice.	Yes	PMIN14.3/02
LPS162	Miss Naomi Chamberlain (Norfolk County Council - Minerals & Waste)	14.3 Land West of North Walsham	Policy NW62/A	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. 'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'	Comments noted, a modification is proposed for reasons of conformity with consultee advice. Conclusion Agree to requested modification.	Yes	PMIN/14.3/03
LPS393	D L Ritchie Will Trust (David Jones)	14.3 Land West of North Walsham	Policy NW62/A	Amend delivery timescales set out in the trajectory as they are too ambitious compared to the national average for sites of a similar scale.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The trajectory in the Plan is indicative and is not agreed upon by developers. The Council accepts that these timelines will likely change. Conclusion No change proposed.	No	
LPS511	Mr Mike Jones (Norfolk Wildlife Trust)	14.3 Land West of North Walsham	Policy NW62/A	As any development in this area would lead to the large scale loss of farmland habitats, with potentially significant impacts on farmland bird species, it will need to be accompanied by a robust biodiversity net gain assessment which takes into account the needs of the species assemblage dependant on these habitats, as well as the habitats themselves. The proposal also crosses the Weavers Way CWS, which will need to be safeguarding and buffered from indirect impacts (noise, light etc.). We recommend that the policy text refers to the above requirements.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The need to address biodiversity net gain is provided for in other policies within the Plan. Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Land to the west of North Walsham to provide a mixed-use sustainable urban extension amounting to 108 hectares, as defined on the Policies Map, is allocated for approximately at least 1,800 dwellings, 7 hectares of employment land, green infrastructure, community facilities and a road linking Norwich Road, Cromer Road and the industrial estate.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Change would alter the allowed quantum of development on site and affect the site's ability to deliver other policy requirements.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Prior approval and adoption of A comprehensive Development Brief incorporating a site wide Vision and Master Plan demonstrating how the development will respond to the particular characteristics of the site and detailing the delivery of all of the uses and infrastructure required in this policy, <u>will be submitted with the first planning application for the site. The approved Development Brief and Vision and Masterplan shall inform any further applications for the site.</u>	This is one of a number of similar representations made by the site promoter seeking flexibility in the policy around the timing of submission of Master Plans and other details which are currently required before planning permission is granted (the term 'prior approval' is used in the policy. The requested amendment(s) seek to allow for the parallel submission and approval of such details with a planning application rather than prior to an application being submitted. The current wording in the plan allows for such parallel consideration so no amendment is recommended. Conclusion No change proposed.	No	

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LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Prior approval of A site wide Design Code to complement the Development Brief detailing the design principles for all development and land uses <u>will be submitted with the first planning application for the site. The approved Design Code shall inform any further applications for the site.</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. (as above) Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Prior approval of A Green Infrastructure Strategy detailing the delivery of the green infrastructure including new areas of open spaces, play areas, sports pitches, strategic landscaping and green corridors, <u>will be submitted with the first planning application for the site. The approved Green Infrastructure Strategy shall inform any further applications for the site.</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. (as above) Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Development proposals will provide the following specific green infrastructure: i. at least <u>approximately</u> 17.47 hectares of new public open space including a new 'town park' of at least <u>approximately</u> 2ha, new sports pitches of <i>approximately</i> 2ha and a minimum of 2.4ha of allotments, <u>or, where appropriate and informed by discussions with relevant stakeholders, qualitative improvements considered to be of equivalent value;</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Would be inconsistent with proposed changes in the first proposed modification suggested. This modification would allow a way out of providing the required allotment and sport pitch provision by providing something else of 'equivalent value'. Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	A substantial area of strategic green infrastructure at a minimum of <u>approximately</u> 10ha to the south and western countryside edge of the development to create a new green edge of the town;	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The requirement should be seen as a minimum Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Prior approval of A Drainage Strategy detailing the delivery of sustainable drainage and flood mitigation & storage measures that will be integral to the urban development and green infrastructure, including using surface water runoff as a resource that contributes to water sensitive urban design (WSUD) and integrating the water cycle within the built and green environment, <u>will be submitted with the first planning application for the site. The approved Drainage Strategy shall inform any further applications for the site.</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This would remove the requirement for the Drainage Strategy to be approved by the Council prior to the submission of an application. Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Delivery of a new road designed as an attractive main residential street through the development with mixed-use frontage usages and segregated cycle paths and footways. This new road should be suitable for HGV traffic (including high sided vehicles) and will connect Norwich Road to Cromer Road and provide <u>facilitate</u> a suitable route over the railway for access to the Lyngate/Folgate Rd industrial estate together with appropriate junctions, <u>to be informed and determined by technical evidence to be submitted with any planning application for the site. It should be delivered, in accordance with the phasing plan agreed as part of the Development Brief full, at the earliest opportunity;</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Off-site improvements to the highways and transport network including key junctions that require intervention and mitigation, <u>to be informed and determined by technical evidence to be submitted with any planning application for the site;</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This is implied as part of the application process. Conclusion No change proposed.	No	

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LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Provision of community facilities including <i>land</i> for a new 2 form entry primary school focused in a broadly central location within the development, a local centre providing options for local convenience retail and health services and other community uses; Delivery of appropriate restrictions on the amount of private traffic (including HGV vehicles) that can travel along the Aylsham Road and Skeyton Road, <u>to be informed and determined by technical evidence to be submitted with any planning application for the site;</u>	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This is implied as part of the application process. Conclusion No change proposed.	No	
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Options for the enhancement of facilities at North Walsham Football Club should be considered in line with local and national standards and guidance from Sport England and other sports bodies, <u>as part of the wider Green Infrastructure strategy for the site;</u>	Comments noted, a modification is proposed for reasons of clarification. Conclusion Agree to requested modification.	Yes	PMIN/14.3/03
LPS440	Sarah Hornbrook, Bidwells (ESCO Developments, Flagship Housing Groups & Lovell Partnerships)	14.3 Land West of North Walsham	Policy NW62/A	Delivery of at least approximately 1,800 homes built with a mix of dwelling types, sizes and tenures in accordance with Policy HOU2 of this Plan. A range of densities and layouts will provide variety within the scheme in line with the approved Design Code.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The term ‘approximately’ allows for a reasonable degree of variation both above and below the stated quantum of development. The term ‘at least’ would place no upper limit on the amount of development. Conclusion No change proposed	No	
LPS736	Mrs Debbie Mack (Historic England)	14.3 Land West of North Walsham	Policy NW62/A	Amend criterion 6 to include the following wording from the HIA: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including Bradmoor Farmhouse and Barns to the East of Bradmoor Farmhouse, which are Grade II Listed. Development should include the following mitigation measures, as shown on the masterplanning for the site as set out in the Regulation 19 Local Plan: Southern area of the site (Skeyton Road to Norwich Road) <ul style="list-style-type: none"> • Retain and enhance hedgerow along Norwich Road (the south eastern boundary of the site) • Retain and enhance landscaping along the southern boundary of the site Middle of the site (Skeyton Road to Alysham Road) • Retain and enhance landscaping buffer along the Weaver’s Way • Retain and enhance hedgerows along the western boundary of the site adjoining Tungate Road • Retain existing trees along Skeyton Road on the eastern boundary of the site. North of the site (Alysham Road to train track) • Retain and enhance the landscape buffer along the northern area of the site to the north of Cromer Road where the site adjoins the railway track and existing residential properties to the east. • Landscape buffer / public open space around Bradmoor Farm cottages to retain where possible the sense of an isolated farm holding. • Retain and enhance hedgerow along Greens Road In addition, add reference to open space/sports facilities in southern portion of site to protect battlefield site.	Comments noted. Proposed modifications have been considered and already addressed by the Council through PC083 (see below) and proposed modifications PMIN/14.3/04 & PMIN/14.3/05 Conclusion Agree to requested modification (part).	Yes	PMIN/14.3/03-05

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PC083	North Norfolk District Council	14.3 Land West of North Walsham	Policy NW62/A	Update policies relating to Heritage Impact mitigation to be fully in line with mitigation options put forward in the HIA and Site Assessment Booklet.	Comments noted. Agree to proposed modification. Conclusion Agree to requested modification	Yes	PMIN/14.3/04 & PMIN/14.3/05
PC084	North Norfolk District Council	14.3 Land West of North Walsham	Policy NW62/A	Add missing requirement for primary school provision.	Comments noted. Agree to proposed modification. Conclusion Agree to requested modification	Yes	PMIN/14.3/06
PC082	North Norfolk District Council	14.3 Land West of North Walsham	Policy NW62/A	This refers to 'Lyngate/Folgate Road industrial estate' in contrast to 14.3.3, bullet 2, which describes 'North Walsham Industrial Estate'. The industrial estate is formed around three principal routes: Lyngate Road, Folgate Road, Cornish Way – collectively 'North Walsham Industrial Estate'. Change to: '...and provide a suitable route via Bradfield Road over the railway for access to the North Walsham Industrial Estate together with appropriate junctions.'	Comments noted. Agree to proposed modification. Conclusion Agree to requested modification	Yes	PMIN/14.3/07
LPS706	Ms Laura Joyce (Natural England)	14.3 Land West of North Walsham	Policy NW62/A	In line with the plan's HRA, we recommend that a project level HRA and/or appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The Council does not consider it necessary to amend the Plan. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process. Conclusion No change proposed	No	
LPS707	Ms Laura Joyce (Natural England)	15.1 Land Adjoining Seaview Crescent, Sheringham	Policy SH04	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments and support noted. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process. Conclusion No change proposed	No	
LPS708	Ms Laura Joyce (Natural England)	15.2 Former Allotments, Weybourne Road, Adjacent to The Reef, Sheringham	Policy SH07	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an	The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.	No	

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				appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Conclusion No change proposed		
LPS512	Mr Mike Jones (Norfolk Wildlife Trust)	15.3 Land South of Butts Lane, Sheringham	Policy SH18/1B	We recommend that the policy text is revised to ensure that there is an appropriate stand-off distance, of at least 20m, between any new built development and the woodland, to avoid direct impacts from construction, proximity to gardens and to minimise noise and light pollution into the woodland. As mitigation, we would also recommend additional vegetation screening between any housing and the woodland, either as new planting or preferably through allowing natural recolonization of a buffer strip from the existing woodland.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. A 20m buffer would have an impact on the number of dwellings provided on site. The site-specific policy includes the need to provide open space, which could incorporate such a buffer. Any discussions on the masterplanning of the site will be determined at the application stage. Conclusion No change proposed.	No	
LPS738	Mrs Debbie Mack (Historic England)	15.3 Land South of Butts Lane, Sheringham	Policy SH18/1B	Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Upper Sheringham Conservation Area. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> • Lower density dwellings on the north and the western extents of the site • Retain landscaping on the northern boundary of the site • Significant landscaping along the boundary of the west of the site to the east of the public right of way • Single storey dwellings on the west of the site to respect the wider landscape • Ensure development does not result in the loss of trees beyond the site boundary to the south of the site • Respect the significance of the Upper Sheringham Conservation Area 	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The provision of landscape buffers is already included within the site-specific policy. Potential impacts on Conservation Areas and their settings is covered elsewhere in the Plan.. Conclusion No change proposed.	No	
LPS709	Ms Laura Joyce (Natural England)	15.3 Land South of Butts Lane, Sheringham	Policy SH18/1B	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, environmental net gain and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMs as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process. Conclusion No change proposed	No	
PC085	North Norfolk District Council	16.1 Land Adjacent Ingham Road	Policy ST19/A	Remove wording on criteria No. 8 'new wording required' as it should have been deleted from the policy before publication.	Comments noted. Council agrees to the proposed modification. Conclusion Agree to requested modification.	Yes	PMIN16.1/01
PC087	North Norfolk District Council	16.1 Land Adjacent Ingham Road	Policy ST19/A	Update landscape comments to fully incorporate HIA mitigation proposals.	Comments noted. Council agrees to the proposed modification. Conclusion Agree to requested modification.	Yes	PMIN/16.1/02
PC088	North Norfolk District Council	16.1 Land Adjacent Ingham Road	Policy ST19/A	Update landscape comments to fully incorporate HIA mitigation proposals.	Comments noted. Council agrees to the proposed modification. Conclusion Agree to requested modification.	Yes	PMIN/16.1/03
LPS317	Mr Ian Reilly, Lanpro (Barry Lancaster)	16.2 Land North of Yarmouth Road, East of	Policy ST23/2	Include policy wording for the requirement to provide a road access point to an adoptable standard that will abut the client's land so access can be achieved from the allocation	Agree. Include additional land in allocated area (Appendix 5) and modify policy to require layout which provides for comprehensive development.	Yes	PMIN/16.2/01

Ref	Name / Organisation	Document Section	Para / Policy / Table / Figure / Map	Requested Modification	Council Response	Requested Mod Agreed? Yes/No	Proposed Mod Ref No.
		Broadbeach Gardens, Stalham		site into the client's land (Edgefield) for future development. If appropriate, include the land in the allocation policy.	Conclusion Agree to requested modification.		
PC090	North Norfolk District Council	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Criteria No. 4 as is currently worded allows room for developer to claim off-site highways provision is unnecessary. The policy then contradicts itself by then requiring a consideration towards traffic capacity, which as worded they too could claim no additional improvements are needed.	Comments noted. A modification is proposed for reasons of improving the effectiveness of the Plan. Conclusion Agree to requested modification	Yes	PMIN/16.2/02
LPS739	Mrs Debbie Mack (Historic England)	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Amend criterion 7 and 9 to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area, including the Stalham Conservation Area, the Stable Block, Church Farmhouse, the barn at Stalham Hall Farm and the Stewards House, all Grade II Listed and Stalham Hall, Grade II* Listed. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): Western Boundary of the site: <ul style="list-style-type: none"> A significant landscape buffer will be required along the western part of the proposed allocation to mitigate against potential impact upon the Conservation Area and nearby listed buildings. Development on the western part of the site should be of a lower density/ single storey development. Eastern Boundary of the site: <ul style="list-style-type: none"> A landscape buffer will be required along the eastern part and boundary of the site to mitigate against potential impact upon the nearby listed Stalham Hall. Open space to be provided on the eastern part of the site to ensure the impact upon Stalham Hall is mitigated. Northern Boundary of the site: <ul style="list-style-type: none"> Strong landscaping along the northern boundary to ensure a rural edge to the settlement Lower density/ single storey dwellings on the northern part of the site Include diagram from HIA in Local Plan. 	Comments noted, The Council has addressed some of the points raised in this representation through PC091 and PC092 (see below) and proposed modifications PMIN/16.2/03 & PMIN/16.2/04. This modification is proposed for reasons of improving the effectiveness of the Plan. Some of these points are already addressed through other criteria in the site-specific policy. Stalham Hall is a significant distance away from the site and heavily obscured from long ranging views by existing vegetation that is not included within the site's boundary so will not be as risk of being lost. Conclusion Agree to requested modification (part).	No	
PC091	North Norfolk District Council	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Criterion 7 - Remove term 'respect' and change it to 'enhance' which is appropriate in terms of protecting an historical asset.	Comments noted. Agree to proposed modification for reasons of improving the effectiveness of the Plan. Conclusion Agree to requested modification	Yes	PMIN/16.2/03
PC092	North Norfolk District Council	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	Policy ST23/2	Criteria No. 7 and No. 9 should be merged together to avoid repetition. Delete Criteria No. 9 and merge with Criteria No. 7.	Comments noted. Agree to proposed modification for reasons of improving the effectiveness of the Plan. Conclusion Agree to requested modification	Yes	PMIN16.2/04
LPS712	Ms Laura Joyce (Natural England)	16.2 Land North of Yarmouth Road, East of Broadbeach Gardens, Stalham	ST23/2	This allocation will also feed into the Broads SAC, Broadland SPA and Ramsar. Due to phosphate concerns, as detailed in the Site Improvement Plan, Natural England agrees that a Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken before the development proposal proceeds. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites. The allocation is also located on Grade 1	Comments noted. The policy under criteria 6 already includes the requirement for a project level HRA in relation to wastewater treatment. The issue of nutrient neutrality and phosphates is covered through proposed main modification PMAIN/3.13/01. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMs as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMs and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.	No	

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				agricultural land. In line with paragraphs 174 and 175 of the NPPF, and SA1 of the Sustainability Appraisal, we recommend that any potential significant implications of the development proposals are also considered at the project level	Conclusion No change proposed		
LPS116	Dr Victoria Holiday	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	Add to policy Provision of high quality landscaping....to protect the residential amenities of neighbouring properties'	Agree that landscaping and general layout and form of development need to be carefully considered to protect the amenity of adjacent occupiers. Conclusion Agree modification	Y	PMIN/18.1/01
LPS185	Greg Hewitt, Wells Town Council (Andrea Long, Compasspoint Planning and Rural Consultants)	17. Wells-Next-the-Sea	Para 17.0.9	Para 17.0.9 needs to be amended to refer to the risk to the Quay and the east end in order to be justified. Consideration should be given to creating access corridors to the affected properties as outlined above from the south side as part of mitigation measures for sea level rise.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Comments unrelated to proposed site allocations. Conclusion No change proposed.	No	
LPS184	Greg Hewitt, Wells Town Council (Andrea Long, Compasspoint Planning and Rural Consultants)	17. Wells-Next-the-Sea	Para 17.0.5	The Local Plan should make clear references to the Natural England report which recommended a reduction in the amount of off-street parking.(NCA Profile: 77 North Norfolk Coast 2013), and its implications for the future planning of the town; the plan is not justified if it either omits or does not take proper account of relevant evidence.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This section relates to constraints and opportunities in relation to the two allocations being provided in the Plan. There is no need to reference the report as Natural England were consulted for both sites in Wells. The Council's adopted Landscape Character assessment SPD is the most up to date evidence in this respect Conclusion No change proposed.	No	
LPS190	Greg Hewitt, Wells Town Council (Andrea Long, Compasspoint Planning and Rural Consultants)	17. Wells-Next-the-Sea	Section 17	The Open Land Area designation (Mill Road Allotments) should be removed from this site as it is unclear what purpose the designation serves generally but here specifically. Instead, the site can be identified as a potential site for Community Led Development.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The area is designated as such because it is an area of designated and undesignated open space (allotments and wider area) which makes an important contribution to the appearance or opportunities for informal recreation in the area. Conclusion No change proposed.	No	
LPS399	Holkham Estate (Mr Garth Hanlon, Savills)	17. Wells-Next-the-Sea	Section 17	Insert new policy XXX to read Land amounting to 7.3 hectares is allocated for continuing use as a seasonal public car park. The car park shall only be used on a seasonal basis from 1st March to 31st October. Development will be subject to compliance with adopted Local Plan policies and car parking standards.	Comments noted. The Council does not consider it necessary to amend the policy as requested. All the alternative options submitted to the council have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets. Conclusion No change proposed.	No	
LPS436	Holkham Estate	17. Wells-Next-the-Sea	Section 17	Promotion of alternative site: Land south of Warham Road,Wells-next-the-Sea	Comments noted The Council does not consider it necessary to amend the policy as requested. A number of alternative options	No	

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	(Mr Garth Hanlon, Savills)			Land amounting to approximately 12.4 Ha is proposed to be allocated for residential development of approximately 210 dwellings and 0.75 hectares of land for light industrial commercial workspace.	have been considered and consulted on in the development of the Plan. More information can be obtained from the supporting site assessment booklets Conclusion No change proposed.		
LPS434	Mr. Peter Terrington	17.1 Land South of Ashburton Close (W01/1)	Policy W01/1	W01/1 should remain outside the development boundary of Wells, and that the site is developed as an exception site. I feel sure Homes for Wells, or another affordable housing provider, would be pleased to acquire the site and develop it, for the benefit of local people. The Council's recommendation, unhelped by the Inspector, at the hearing for the previous LP, to bring nW01/1 forward as an exception site must be upheld. Clearly there is a paramount need for affordable housing, for local people, in Wells, and this can be achieved through the development of a rural exceptions site on W01/1.	Comments noted. The Council does not consider it necessary to amend the policy as requested. This site has not come forward as an exception site as previously intended. The proposed allocation will deliver a proportion of deliverable housing. Conclusion No change proposed	No	
LPS213	Miss Naomi Chamberlain, Norfolk County Council	17.2 Land Adjacent Holkham Road (W07/1)	Policy W07/1	Paragraph 17.2.4 needs to be amended to reference Mill Road.	Agree. Modification is proposed for reasons of clarification. Change reg from Mill lane to Mill rd Conclusion Agree to requested modification.	Yes	PMIM/7.2/0.1
LPS153	Miss Naomi Chamberlain, Norfolk County Council	17.2 Land Adjacent Holkham Road (W07/1)	Policy W07/1	Policy W07/1, point 3 must be amended to Provision of convenient and safe vehicular access to site from Mill Road, in accordance with the requirements of the Design Manual for Roads and Bridges (DMRB) and to the satisfaction of the Highway Authority.	Agree. Modification is proposed for reasons of clarification. Conclusion Agree to requested modification.	Yes	PMIN/17.2/0.3 & PMIN/17.2/04
LPS262,L PS415	Mr Tony Fullwood	17.2 Land Adjacent Holkham Road (W07/1)	Policy W07/1	Amend the wording of W07/1 Land Adjacent Holkham Road as follows: Land amounting to 2.6 hectares (<u>increase site area to include land necessary to achieve vehicular access from Mill Road and other pedestrian cycle links specifies in the policy</u>), as defined on the Policies Map (<u>amend Policies Map to include land necessary to achieve access from Mill Road and other pedestrian cycle links specifies in the policy</u>), is allocated for residential development of approximately 40 dwellings, 0.6 hectares public open space, and associated on and off-site infrastructure.	Comments noted. Modification agreed in part to ensure that sensible vehicular access to Mill Road can be provided. Conclusion Agree to requested modification in part.	Yes	Modify plan as per Appendix 5
LPS310	Mr Clive Albany	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	The Para 6 of the Policy document should be amended to the wording in the paragraph below that was agreed to on Dec 21st. (see attached file) The NNDC Planning officer agreed in writing to amend the end of Para 6 to read " <u>to facilitate access and protect the residential amenities of adjacent occupiers</u> ".	Comments noted. A modification is proposed for reasons of clarification and to ensure consistency Conclusion Agree to requested modification.	Yes	PMIN/18.1/01
LPS184	Mr Clive Albany	Policy BLA04/A Land East of Langham Road	Policy BLA04/A	BLA04/A should be abandoned and BLA07 designated as the preferred allocation. It will mitigate all of the above concerns that make BLA04/A inappropriate in a village set in an AONB. The land of BLA07 is owned by the county council (NCC). NNDC should have approached NCC to acquire outright or at least agree a very long term lease for a portion of this land. Broadland Housing Trust approached Blakeney Parish Council and the Blakeney Neighbourhood Housing Association suggesting to work together to provide social housing on part of BLA07.The Parish Council supported this initiative. The plan was to build 8 social housing properties on a small strip of this land running alongside to Langham Road.	Comments noted. The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan. The site is already inside the settlement boundary but forms part of the important open space for Blakeney and development would result in a loss of beneficial use. More information is contained in the site assessment background paper. Conclusion No change proposed	No	

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				NNDC should review this now as a viable option as it has obvious environmental and social benefits for the village. The use of a small part (probably only 0.25ha) of an unused playing field is more beneficial to Blakeney and its environment than BLA04/A in that it achieves broadly the same key housing objective of delivering 8 social housing units without the need to use up valuable agricultural land and spoil the setting of Blakeney village when entering via the B1156.			
LPS698	Ms Laura Joyce (Natural England)	18.1 Land East of Langham Road, Blakeney	Policy BLA04/A	In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and/or Foul Sewage Drainage Strategy as part of the development proposal.	The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process. Conclusion No change proposed	No	
LPS28	Mrs Maggie Deeley	19.1 Land East of Astley Primary School, Briston	Policy BRI01	A full traffic survey should be conducted to assess the current issues on Fakenham Road and the results published.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The highway authority do not object to the allocation. Further detail of the site access arrangements can be considered at application stage. Conclusion No change proposed.	No	
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Land amounting to 1.4 hectares, as defined on the Policies Map, is allocated for residential development of approximately 25 40 dwellings, public open space, school parking and associated supporting on and off-site infrastructure.	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. This would represent over development on the site and would limit the ability of the site to provide for the required infrastructure as set out in the site-specific policy. The use of 'approximately' to describe the number of dwellings proposed provides for a reasonable degree of flexibility. Conclusion No change proposed.	No	
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Retention of existing roadside hedges, <u>except where removal is required to facilitate access</u> , and setting back of development on both road frontages;	Agree. Modification is proposed for reasons of clarification. Conclusion Agree to requested modification.	Yes	PMIN/19.1/01
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Provision of a car parking area for the school (pick up and drop off), <u>unless already provided on an alternative site</u> ;	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Both BRI01 and BRI02 are best situated to provide this infrastructure requirement. The Policy requirement as currently worded is nevertheless sufficiently flexible to allow for either on or off site provision.	No	

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					Conclusion No change proposed.		
LPS429	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Provision of a layout of development which would protect, or relocates, the existing water main that crosses the site located on the site;	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. The water main is located within the site's boundary and is likely to require relocation. Conclusion No change proposed.	No	
LPS743	Mrs Debbie Mack (Historic England)	19.1 Land East of Astley Primary School, Briston	Policy BRI01	Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> • Respect and reflect the massing and heights of surrounding dwellings and buildings, many of which are single and one and a half storeys in height; • Existing hedgerows / landscaping to be retained and enhanced on the eastern, western and southern boundaries and preferably on northern boundary depending on access arrangements. • Open space should be located in the south-western area of the site, incorporating the existing pond. 	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. These requirements are already set out in the criteria in the site-specific policy. It is not possible to determine the most suitable location for open space at this time. This will be determined through the application process. Conclusion No change proposed.	No	
LPS28	Mrs Maggie Deeley	19.2 Land West of Astley Primary School, Briston	Policy BRI02	A full traffic survey needs to done and published, due to the access issues onto The Lane and Fakenham Road. The proposal needs to reduced by at least two thirds to reduce congestion, pollution (especially outside a school) and accidents.	Comments Noted. The Council does not consider it necessary to amend the Plan as proposed. The site-specific policy indicates an option for the developers to decide which access point from Hillside or Fakenham Road will be the most appropriate, and a traffic assessment may be included within that decision as part of the application process. Conclusion No change proposed.		
LPS39, LPS57	Mr Ian Ruston	19.2 Land West of Astley Primary School, Briston	Policy BRI02	The entrance to BRI02 should be chosen to be onto Fakenham Road and could be the same entrance as that which is proposed to give parking for those vehicles collecting and dropping off children attending the school.	Comments noted. The site-specific policy indicates an option for the developers to decide which access point from Hillside or Fakenham Road will be the most appropriate, and a traffic assessment may be included within that decision as part of the application process Conclusion No change proposed.	No	
LPS464	Mrs Phoebe Heath, Bidwells (Mr Richard Waddingham)	19.2 Land West of Astley Primary School, Briston	Policy BRI02	Setting back of development from the road frontage along Fakenham Road, <u>unless an alternative design approach is identified as more practical and feasible;</u> 3. Provision of a car parking area for the school (drop-off and pick-up) <u>unless already provided on an alternative site;</u> 7. On-site delivery of <u>not less than approximately</u> 1 hectares of public open space on the site frontage with Fakenham Road, <u>unless an alternative design approach is identified as more practical on site;</u> 9. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west,	Comments noted. A modification is proposed in relation to the first proposed change only. Conclusion Agree to requested modification (part).	Yes	PMIN/19.2/01
LPS551, LPS553, LPS23	Ms Louise Tarling	19.2 Land West of Astley Primary School, Briston	Policy BRI02	The proposed allocation should not include Hillside as a potential access route.	Comments noted. The site-specific policy indicates an option for the developers to decide which access point from Hillside or Fakenham Road will be the most appropriate. Suitability of either option can be determined at application stage.		

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					Conclusion No change proposed.		
LPS744	Mrs Debbie Mack (Historic England)	19.2 Land West of Astley Primary School, Briston	Policy BRI02	Add criterion from HIA to read: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including, Manor Farmhouse, a grade II listed building. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment): <ul style="list-style-type: none"> • Take account of the coalescence of settlements by providing landscaping to the eastern boundary by strengthening and enhancing the existing boundary treatment to create a physical gap in the built form between the two settlements • Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys • Existing hedgerows / landscaping to be retained and enhanced on the western and northern boundaries • Landscaping to the eastern boundary should be extended and enhanced to create a gap between the settlements • Open space should be located on the eastern boundary to further create a gap between the settlements The policy should be amended to read, Development should preserve the grade II listed Manor Farmhouse and its setting. Also add diagram.	Comments noted. Partly agreed, add additional requirement to Policy to ensure impacts on Heritage Assets are properly considered and addressed. Conclusion Agree to requested modification (part)	Yes	PMIN/19.1/02
LPS348	Miss Natalie Beal (Broads Authority)	20 Ludham	20.0.2 & 20.0.3	Ludham, para 20.0.2 and 20.0.03 references to the 'Norfolk Broads' change to Broads Authority Executive Area?	Comments noted. The Council agrees to the proposed modification. Conclusion Agree to requested modification	Yes	PMIN/20.0/01 & PMIN/20.0/02
LPS395	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20 Ludham		As set out in our separate representations on Policy HOU 1, there is no justification for the comparatively low level of growth proposed in this sustainable Large Growth Village. Furthermore, the Council has neglected to assess all the sites submitted to it and has not updated the HELAA since 2017. There is a need to identify additional site allocations in Ludham to achieve both the current level of allocated development and help to sustainably meet the need for more site allocations to meet the district's true LHN.	Comments noted. The Local Plan identifies the appropriate level of sustainable growth that the settlement can accommodate. Conclusion No change proposed.	No	
LPS329	Mr Ollie Eyre, Deloitte (Church Commissioners for England)	20 Ludham		The Council has failed to justify the re-allocation of the Ludham sites from the previous Plan and explained why it considers that the sites will now be delivered in this Plan period. This needs addressing in order for the policy to be justified. Please see full representation for further detail.	Comments noted. The Council has undertaken work and actively engaged with the promoters of the proposed allocations in Ludham to ensure deliverability within the plan-period. Conclusion No change proposed.	No	

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LPS397	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20.1 Residential: Land South Of School Road (LUD01/A)	Policy LUD01/A	<p>To ensure that Ludham delivers sufficient housing to meet its share of the district's needs, we consider that the site allocation at Land South of School Road should be extended to include adjoining land to the south and west of the existing allocation. This land was submitted previously but has so far not been assessed in the HELAA.</p> <p>We have enclosed a Location Plan at Appendix 1 [of our representation] that shows the extent of the adjoining field that is owned by our client and we are pleased to set out three options for the allocation/development of our client's land.</p> <p>Amend Policy LUD01/A to the following depending on the option:</p> <p>Land amounting to approximately 2.2, 4.6 or 6.1 hectares [depending on option chosen] 1.25 hectares, as defined on the Policies Map, is allocated for residential development of approximately 20, 35 or 64 dwellings [depending on option chosen] inclusive of open space and associated on and off-site infrastructure. Planning permission will be granted subject to compliance with the relevant policies within this Plan and the following site specific requirements:</p> <p>Provision of a highway access via Willow Way and School Road [options 2 and 3 only];</p> <p>2. Provision of pedestrian footway to connect with the school bus service stop on School Road and a footway connection to Norwich Road along the existing field access;</p> <p>4. Retention and safeguarding of trees along the western boundary that are covered by a group Tree Preservation Order; [N.B. There are no TPO trees. It is assumed that this requirement has been copied from Policy LUD06/A by mistake].</p> <p>5. Delivery of a high quality landscaping scheme particularly along the western boundary and along a view corridor to towards the Grade I listed church from the corner of School Road and Pound Road;</p> <p>6. Development should have careful attention to form, building heights, densities and site layout in order to allow for views from School Road to the Grade 1 Listed church;</p> <p>10. Delivery of not less than approximately 0.5, 2.2 or 3 ha [depending on option chosen] of public open space;</p>	<p>Comments noted. The land adjacent to the proposed allocation has been assessed as sites LUD01/B to the west and LUD01 to the south. The outcome of these assessments is presented in the Ludham Site Assessment Booklet.</p> <p>The Council has noted the proposed modification to criterion 4 of the Policy and propose a modification to correct this factual error. The remaining proposed modifications to the policy are not relevant to the proposed allocation.</p> <p>Conclusion Agree to requested modification (part).</p>	Yes	PMIN/20.1/01
LPS396	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20.2 Residential: Land At Eastern End Of Grange Road (LUD06/A)	Policy LUD06/A	<p>No evidence has been presented to justify why the allocation of Land at eastern end of Grange Close has been rolled over, given that there have not been any planning applications on the site in the 10 years since it was first allocated in 2011.</p> <p>The Council's Five-Year Supply of Housing Land (April 2020) identifies Land at the eastern end of Grange Close as having no current developer interest and that there is no likelihood of the delivery of the housing within the five-year period. The Local Plan states at paragraph 20.2.3 that the owners of the site have indicated support for the allocation, but given the</p>	<p>Comments noted. Impact on TPO has been assessed and access is achievable.</p> <p>Conclusion No change proposed</p>	No	

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				<p>history of the site we do not consider this to be sufficient to conclude that the site is deliverable. In fact, the Council's own housing trajectory recognises the uncertainty here and doesn't forecast delivery on the site until 2032/33. There is clearly insufficient evidence to demonstrate that the site is deliverable during the plan period and the policy cannot therefore be considered effective or sound.</p> <p>Further, we note that the policy wording requires the provision of highways access via Grange Close and the retention and safeguarding of trees along the western site boundary that are covered by a group Tree Preservation Order (TPO). As shown on the photograph below that looks east along Grange Close, it will clearly not be possible to construct an access to adoptable standard without resulting in the loss of at least one of these protected trees and potentially two others when the impact of excavation in root protection areas is taken into account. It is clearly not appropriate or sound, given that there are reasonable alternatives, to allocate a site that cannot be accessed without removing TPO trees.</p> <p>Policy LUD06/A is not sound and should be deleted from the Local Plan in favour of other more suitable and deliverable sites.</p>			
LPS396	David Jones, Armstrong Rigg Planning (D L Ritchie Will Trust)	20.2 Residential: Land At Eastern End Of Grange Road (LUD06/A)	Policy LUD06/A	<p>Propose alternative site: Land at Catfield Road LUD02/A</p> <p>All sites in Ludham score amber for Utilities Capacity and the site is only scored amber for Flood Risk due to a very small area to the west of the site being in Flood Zone 2. This area needn't be included in the developable area of the site and could be utilised as natural greenspace which would easily resolve this sole constraint to development on the site.</p>	<p>Comments noted The Council does not consider it necessary to amend the policy as requested. A number of alternative options have been considered and consulted on in the development of the Plan, including LUD02/A. More information can be obtained from the supporting site assessment booklets</p> <p>Conclusion No change proposed</p>	No	
LPS703, LPS702	Ms Laura Joyce, Natural England	20.2 Residential: Land At Eastern End Of Grange Road (LUD06/A)	Policy LUD06/A & Policy LUD01/A	<p>This policy supports residential developments which may result in an increase in recreational use of designated sites. This allocation will also feed into Ludham WRC and ultimately discharged into the Broads SAC, Broadland SPA and Ramsar. Due to the surface water ingress concerns highlighted in the plan's HRA, we agree that a site-specific Water Catchment and Foul Water Drainage Strategy, as well as the enhancement of sewage infrastructure to deal with such concerns, should be undertaken prior to the development proposal proceeding. Furthermore, a project level HRA should also take place to determine no likely significant effects, both hydrological and recreational, of the development on the protected sites.</p>	<p>Support noted. Criteria 9 and criteria 5 (LUD01/A & LU06/A) already contain the requirement to undertake a project level HRA in relation to sewage infrastructure in line with the Council's HRA. For clarity a modification is proposed to ensure it is clear that wider hydrological issues are also assessed. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMs as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process.</p> <p>Conclusion Agree to requested modification (part)</p> <p>Add following text to end of Criteria 9 & 5 of policy LUD01 and 6:</p>	Yes	PMIN/20.2/01 PMIN20.1/02

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					<u>And hydrological issues to demonstrate adequate safeguards are in place to rule out adverse effects on the integrity on the protected sites from alone or in combination.</u>		
LPS145	Miss Naomi Chamberlain, Norfolk County Council - Highway Authority (Engineer (Major & Estate Development))	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B, Criterion 3	Policy MUN03/B, point 3 should be revised to enable provision of a highway access at Cromer Road, or if not feasible, at Church Lane, to the satisfaction of the Highway Authority.	Comments noted. Council agrees to requested modification to the Policy. Conclusion Agree to the requested modification	Yes	PMIN/21.1/01
LPS214	Miss Naomi Chamberlain, Norfolk County Council - Highway Authority (Engineer (Major & Estate Development))	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B, Criterion 4	Policy MUN03/B, point 4 should be revised to require a continuous footway at the Church Lane site frontage, along with off-site improvements to provide continuous footway at Church Lane, between Cromer Road and the existing footway at Station Road, to the satisfaction of the Highway Authority.	Comments noted. Council agrees to the requested modification to the Policy. Conclusion Agree to the requested modification	Yes	PMIN/21.1/02
LPS211	Norfolk County Council - Minerals & Waste Policy	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B	The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019. <i>'The site is underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - 'safeguarding' (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.'</i>	Comments noted. Council agrees to the requested modification to the Policy. Conclusion Agree to requested modification	Yes	PMIN/21.1/03
LPS745	Mrs Debbie Mack (Historic England)	21.1 Residential: Land off Cromer Road & Church Lane (MUN03/B)	Policy MUN03/B	Amend policy to include wording from HIA: Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area including the view of the Church of All Saints a grade II listed building (from Church Lane) and the proximity and low level of the former railway villas within Mundesley Conservation Area in relation to the site. Development should include the following mitigation measures (as set out in further detail in the Heritage Impact Assessment): <ul style="list-style-type: none"> • Given the elevated position of the northern part of the site, consideration should be given to the height and scale of new residential development in relation to the lower level adjacent dwellings to the east of the site. • The layout should also ensure for the retention and strengthening of as much existing landscaping as possible and in particular, the landscaping associated with the railway cutting on the eastern side of the site. • Any residential development should be set back from the eastern boundary to avoid the important view of the church when looking north along Church Lane. • The layout, scale and height of any new residential development should also take account of the Victorian Villas located on the east side of the site, which are set at a significantly lower level than the site, by not positioning any 	Comments Noted. The policy as written already addresses the proposed modifications raised in each bullet point. Conclusion No change proposed.	No	

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				new dwellings too close to these existing properties and giving consideration to their orientation and height, in order that they would not dominate or overlook/ overshadow. Include diagram from HIA in Local Plan. Update HIA to reflect new site area.			
LPS695	Ms. Laura Joyce	21.1 Residential: Land off Cromer Road & Church Lane	Policy MUN03/B	The policy supports residential developments which may result in an increase in recreational use of designated sites. In line with the plan's HRA, we recommend that a project level HRA and appropriate assessment is carried out to determine no likely significant effects on nearby designated sites. Additionally, Natural England agrees with the need to provide green infrastructure, contribute to GIRAMS, and provide an appropriate Surface Water and Foul Sewage Drainage Strategy as part of the development proposal.	Comments noted. The policy already includes the requirement to provide contributions in respect of offsetting recreational impacts in line with the Norfolk wide GIRAMS as agreed with Natural England and the HRA/AA concludes appropriately no LSE. As part of the GIRAMS and policy ENV5 a screening assessment project level HRA is undertaken to inform the process. Conclusion No change proposed	No	
PC097	North Norfolk District Council	21.1 Residential: Land off Cromer Road & Church Lane	Policy MUN03/B	Change to 'approximately 2 hectares'.	Comments noted. Modification is proposed for reasons of clarification. Conclusion No change proposed	Yes	PMIN/21.1/04
LPS235	Ms Sarah Mitchell, (RSPB)	22 Tattersett	Policy E7	We suggest the Plan acknowledges the presence of stone-curlew at this site and the need for further assessments: Given the scale and location of the proposed allocation we would expect to see an Environmental Impact Assessment (EIA) as part of the development planning stage, and this should include an assessment of the effects of the development on breeding stone-curlews. The assessment will need to be informed by a search of historical stone-curlew records (which can be obtained from the RSPB) and a new stone-curlew survey on any suitable habitat outside of Sculthorpe Airfield within at least 1500m of the development site. This survey should take place over three consecutive breeding seasons to allow for annual variation in habitat suitability due to changes in crop cover on arable land. Based on these survey results the level of impact will require assessment and we consider that mitigation will be required to avoid, as far as possible, impacts on the stone-curlew population which could be of national significance. If impacts cannot be avoided then the application should not be consented.	Comments noted. Modification is proposed for reasons of clarification. The plan wide HRA screens out likely significant effects on European sites . Policy E7 (land at Tattersett Business Park) contains, at criterion 4, the requirement to demonstrate that a proposal will have no adverse impacts on protected wildlife and no change is required. The issue would be considered at implementation stage. However, there is merit, for reason of clarification, to include a further reference in para 22.1.4, under constraints, that any proposal would need to take into account the potential presence of nesting Stone Curlew and other protected species and suitable habitat outside of Sculthorpe Airfield within at least 1500m of the development site. Conclusion Agree to requested modification (part).	Yes	PMIN/22.1/01
LPS713	Ms Laura Joyce, Natural England	22.1 Employment: Tattersett Business Park		Due to its proximity to SSSIs, any potential impacts of the development on designated site features should be fully considered and assessed. Priority habitats and species, such as Stone Curlew, should also be considered to assess the impact of the development proposals on local wildlife, in line with paragraphs 175 and 176 of the NPPF.			
LPS160	Miss Naomi Chamberlain, Norfolk County	22.1 Employment: Tattersett Business Park	Policy E7	Norfolk County Council in its capacity as the Mineral Planning Authority considers that Policy E7 is currently unsound; as it is inconsistent with national policy in relation to mineral resource safeguarding.	Comment noted, a modification is proposed for reasons of conformity with consultee advice. Add standard safeguarding criteria.	Yes	PMIN/E7/01

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	Council (Minerals & Waste Policy)			<p>The policy can be made sound by including the wording below, which was included in the response by the Mineral Planning Authority, to the Regulation 18 sites consultation in May 2019.</p> <p>‘The site is partially underlain by a defined Mineral Safeguarding Area for sand and gravel. Any future development on this site will need to address the requirements of Norfolk Minerals and Waste Core Strategy Policy CS16 - ‘safeguarding’ (or any successor policy) in relation to mineral resources, to the satisfaction of the Mineral Planning Authority.’</p>	<p>Conclusion Agree to requested modification.</p>		
LPS746	Mrs Debbie Mack, Historic England	22.1 Employment: Tattersett Business Park	Policy E7	<p>Whilst there are no designated heritage assets within the site boundary, there are two scheduled monuments (a bowl barrow and a saucer barrow) to the southwest of the site. Any development has the potential to impact upon the setting of these heritage assets. However, dependent upon the precise nature and scale of development and with careful landscaping along the southwestern edge of the site some development should be possible on this site.</p> <p>The site is considered in the Heritage Impact Assessments. We welcome the preparation of a Heritage Impact Assessment in the Historic Environment Topic Paper. This provides robust evidence of the potential impact on the historic environment and suggests appropriate mitigation measures.</p> <p>The HIA sets out appropriate policy wording for inclusion in the Plan (see page 277). However, unfortunately this wording has not been included in the Plan. The policy needs amending to incorporate the wording from the HIA.</p> <p>We appreciate that criterion 1 of the policy does include some protection for the historic environment, but this falls short of the recommendations of the HIA.</p> <p>Either: Add criterion to read: “Development should preserve and enhance the scheduled monuments to the southwest of the site and their settings. Or: add wording from HIA: “Development should conserve, or where appropriate enhance, the significance of heritage assets (including any contribution made to that significance by setting) both within the site and the wider area. Development should include the following mitigation measures (as set out in further detail in the Historic Impact Assessment):</p> <ul style="list-style-type: none"> • Retain and enhance landscaping on all boundaries of the site. • Retain existing green spaces between units on the site • Retain footprint and scale of existing former airbase buildings 	<p>Comments noted ,a modification is proposed for reasons of clarification.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/E7/02

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LPS606	Ms Kerry Harris, Thornage Parish Council	22.1 Employment: Tattersett Business Park	Policy E7	<p>For the avoidance of confusion, there should only be one reference to an “E7” policy, noting that the same prefix is also applied to Land at Tattersett Park.</p> <p>As this is a site specific allocation, and, the only one for Tattersett it could be more sensibly identified as “TATT1” with commensurate changed references within Section 22 of the Plan.</p>	<p>Comments noted, a modification proposed for reasons of clarification and consistency.</p> <p>Conclusion Agree to requested modification.</p>	Yes	PMIN/22.1/02
N/A	North Norfolk District Council	10.1 – 22.1	Policy C07/2, Policy C16, Policy C22/2, Policy F01/B, Policy F02, Policy F03, Policy F10, Policy H17, Policy H20, Policy HV01/B, Policy NW52, Policy NW62/A, Policy SH04, Policy SH07, Policy SH18/B, Policy ST19/A, Policy ST23/2, Policy W01/1, Policy W07/A, Policy BLA04/A, Policy BRI01, Policy BRI02, Policy LUD01/A Policy LUD06/A Policy MUN03/B Policy E7	<p>Amend relevant criterion in each site-specific Policy in the Plan to include the following wording</p> <p><u>submission, approval and implementation</u></p> <p>This is to ensure that where Policies currently require the ‘submission’ of details the Policy also requires the ‘approval’ of details and their subsequent ‘implementation’.</p>	<p>Comments noted. Agree to the proposed modification.</p> <p>Conclusion Agree to requested modification</p>	Yes	PMIN10.1/01