

Appendix 1 –Schedule of Representations and Recommendations

Extract of Report of Representations

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

Representations from Town and Parish Councils

Parish	Comment Type	Representation	Officer Comment/Recommendation
Cromer	General Comments	Policy needs to be firmed up to ensure that affordable homes are maintained in perpetuity. Community led housing is supported.	Noted: Affordable housing by definition is required to remain at an affordable price for future eligible households.
Sheringham	General Comments	STC would like to see an agreed percentage of houses in all new large-scale developments reserved for permanent occupancy	Not Agreed. Such restrictions are unlikely to be affective (see report)
Cromer	General Comments	There is a lack of allocation for social care provision within the local plan. With an aging population, the provision of adequate health and social care is increasingly important	Disagree. The Council aims to ensure that a proportion of all new homes built are suitable and easily adaptable for occupation by the elderly and infirm through Policy HOU8 and makes specific provision for those that require specialist care through Policy HOU2.
North Walsham	Object	There is no mention in the draft of social housing. Given the long waiting list for such housing at present the Town Council strongly believes that up to 30% of housing be affordable. At least 50% of this must be Social Housing (15% of total housing) to help alleviate the current and future waiting lists. The Town Council believes that Social Housing should be distributed throughout the developments and not congregated in a single area	Partly Agree: Policy HOU2 details the affordable housing requirements. It allows for the provision of all types of affordable homes including social housing via footnote 1 included in the policy. However it is agreed the policy lacks clarity. Rec Members to be updated at the meeting following further discussion with Housing Enabling Team
Sheringham	Support	STC agrees with the proposals outlined in the Plan and believes the greater demand for affordable housing is from prospective renters/purchasers for 2 or 3 bedroomed dwellings but particularly for rented properties and accordingly this is what developers would be encouraged to build. This is not included in the plan and STC believe this is essential and reflects the views of our community	Partly Agree: Policy HOU2 details the affordable housing requirements. It allows for the provision of all types of affordable homes including social housing via footnote 1 included in the policy. Rec Members to be updated at the meeting following further discussion with Housing Enabling Team

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Wells	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Council wishes to draw attention to the importance of a good quality of services and facilities for residents of the town, the importance of school provision, health care and emergency services and of housing for their providers and asks that they be explicitly included in the considerations of the District Council.</p> <p>Sustainable Development . The Council wishes the town to be developed sustainably with a healthy demographic balance for future generations in accordance with government guidelines (NPPF).</p> <p>The Council endorses the encouragement of Community Land Trusts (Homes for Wells) and Neighbourhood Plans. (LP 7.12). The Council wishes local plan policies explicitly to include provision for families, for local people as well as the elderly, those unable to live at home and those working in the town. (LP 9.24-30) Housing The Local Plan states its purpose as ensuring that sufficient homes of the right type are built in the right place and at the right times to meet all of the accommodation needs of the town as identified in the most up-to-date evidence. (LP 9.1) It states that affordable homes need to be genuinely affordable to those with lower incomes but recognises that rented accommodation will be the main form of affordable tenure. Given the topography of the town, any building would have to be on the edge of the built area. The Council supports the proposal that a ‘significant proportion’ of new homes shall be affordable and not be available for second home use (LP 9.5). The Council supports the idea of second homes’ occupancy restrictions in order to make possible the buying of property by locals. The Council is of the view that in order for the town to function effectively as a strong and vibrant community those who need to live reasonably close include not only teachers, medical and care staff and those who man emergency services but also those who provide for the needs of tourists as well as residents’ needs</p>	<p>Partial support noted. The Council has used current evidence base and engaged with relevant bodies including health and education bodies to identify where additional social infrastructure may be required as a result of new development. The Council welcomes the recognition that towns should grow sustainably and the support for the policy approach which addresses the need for small scale family homes, sets the viable affordable home percentage and requires specialist elderly accommodation on larger scale sites.</p> <p>It is not agreed that second home occupancy restrictions would be an effective measure for the reasons outlined in the report.</p>
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Representations from Organisations

Organisation	Representation	Officer Comment/Recommendation
Broads Authority	Affordable Housing – suggest you mention that the Broads Authority defers to/refers to/has regard to policies of NNDC in relation to Affordable Housing. • Figure 6 – please show the Broads Authority Executive Area on this map as we will apply this policy.	Agreed: Consider feedback in the finalisation of this policy. Add appropriate text to supporting justification and amend Map as requested.
NCC	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The County Council welcomes the importance of delivering affordable homes and it is understood from the District Council Annual Monitoring report 2018 that the target of 300 affordable homes per annum was not met between 2012 and 2018. The emerging Local Plan has as a target of 200 homes per annum, which is around 20% of total planned growth. This is a significantly higher figure than achieved in previous years and as such is welcomed	Support noted. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community
NCC/ Adult social care	The County Council recognises the need to increase housing options for older people and values schemes, which allow an older person’s independence to be maintained in the community. The council is especially keen to promote the development of extra care housing, which are independent homes (rented or owned) where residents have a minimum care need (four hours per week) and are also covered by on-site staff for any emergency care need. The County Council also recognises that a proportion of these units need to be affordable – covering both rent and shared ownership – in order for the needs of all of the local population to be met. 10.2. The County Council have recognised that there is a need for 486 units of extra care in North Norfolk, which have a minimum site requirement of 60 units per site, with sites being 2-3 acres with ample communal space both inside and out. Attached (Appendix 3b) is a (draft) planning position statement and a general position statement for extra care in Norfolk (Appendix 3a). The County Council also recognises a need for care homes to be considered in line with new developments, particularly the provision of nursing homes, in line with older people’s population growth. It is also expected that these will have similar unit and size requirements as extra care, although sites could start at 1.5 acres if required. 10.3. The County Council’s Adult Social Care team would like to meet with NNDC Planners to discuss the above issues and how best these could be identified in the emerging Local Plan	Noted. Support welcomed. Further evidence included in the June 2019 position statement on developing extra care housing in Norfolk is welcomed and will be used to help finalise and support the policy approach.

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<p>Gladman Developepments (Barnes, Mr Craig)</p>	<p>Policy HOU2 sets the housing mix requirements of the Policy. The Policy sets out the requirements for affordable housing, housing mix, affordable housing mix, self-build requirement and specialist elderly/care provision requirements for each site according to the scale of the development. Gladman broadly agrees that the evidence is in place to justify the requirements set for affordable housing and housing mix. The requirements should however be reviewed should the updated SHMA suggest the need for a different housing mix, and the policy should be applied flexibly to account for site/development specific issues or changing needs over time. A scaled approach recognises the differences in viability and opportunity to accommodate a range of housing products within a development. Its application is therefore important to enhance the deliverability of development in the plan period. Gladman also support the proposal to establish different zones for affordable housing requirements of the District. This recognises that values vary across the authority area and as such affects the financial capacity of development to viably accommodate required levels of affordable housing. Gladman is however concerned with the requirements set out within the policy for self-build plots and specialist elderly/care provision. For Self-build, the Policy advises that at least one plot or 2% of total units on sites of 26 to 300 dwellings will be required as self-build plots, with an additional plot or 2% provided per additional 150 dwellings. Gladman is concerned that the policy requirement will deliver an oversupply (89) of self-build when compared to need. The latest register shows a total of 9 individuals on the register with a need for self-build plot. The register also shows the preferred location of the plot provided. This significantly outstrips demand for self-build in the District and excludes the potential for additional contributions from windfall development. Not considered that the requirements of the Policy are justified by the evidence of need. A further problem with the approach applied through the policy is its ability to respond to the preferences of those on the Self-build register. Examining the most recent register, it is clear that there is demand for self-build plots in lower order settlements. The proportionate basis of the policy means however that the no self-build plots will be delivered in these settlements through this policy given that the scale of development required to deliver this would be in in conflict with Policies SD3 and HOU1 of the Local Plan. As a result, the policy does not respond to needs for self-build in rural areas reducing the effectiveness of the Policy. It is also unclear how the requirement would be addressed where there is no evidence of interest for self-build in the location where the development is proposed. If this is the case would these plots revert to market dwellings? If so how, &when? It is also unclear when and how self-build plots are to be dealt with through the planning application</p>	<p>The general support for much of the Policy is noted and welcomed.</p> <p>With respect to self-build requirements it is not agreed that the requirement exceeds the evidence of likely need. The self-build register is not likely to represent the true demand for self-build opportunities, the policy requirement of 2% self-build on larger schemes of 26 units and above is modest. It is agreed that the supporting reasoned justification should indicate how such plots are to be provided and marketed for agreed periods of time. It is not agreed that self-build should enjoy an exemption from countryside policies. It is important that self-build development is as sustainably located as all other types of housing development</p> <p>It is also agreed that the term ‘Specialist Elderly Care’ requires further definition. This will be informed by the Elderly Persons Accommodation Needs study currently being prepared</p> <p>Recommendation: Amend the supporting text of the policy in relation to self-build</p> <p>Include a specific definition of Specialist Elderly Care to include those types of units/accommodation required by the evidence.</p>
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process. Further detail is necessary to set out how this policy is to be implemented to ensure that it is effective in securing self-build plots. **In terms of the requirements of Policy HOU2 for elderly provision, Gladman accept the pressing need for elderly accommodation within the District, however consider that the Policy should hold greater flexibility in requiring such provision on-site. It may not always be the case, owing to the location/characteristics of the site and proposed development that the site would be a suitable location for elderly/specialist provision. The policy is also imprecise about the types of elderly/specialist provision that can be provided in response to its requirements referring only to the dwellings needed as “bedspaces”. Whilst this provides welcomed flexibility, it also introduces uncertainty for applicants should the type of dwellings provided not reflect the Council’s expectations. Proposed Changes:** Gladman consider that the following two approaches should be taken: **Firstly**, the Council should seek to allocate small sites (in agreement with the landowner) which are entirely comprised of self-build plots. This would avoid the potential problems of disposal of self-build sites by the housebuilders. It would also overcome potential concerns regarding health and safety as well as site security by avoiding the need to accommodate self-build plots within a larger scale development. Gladman consider that it would **be helpful for the types of elderly/specialist provision desired to be listed by the Council.** This list should be expansive and not focused on traditional C2 accommodation (because the evidence doesn’t support this) but should also include modern types of elderly/specialist provision such as flats to purchase and rent, and communal living accommodation. **Secondly**, the Council should seek to encourage self-build through windfall development by relaxing its open countryside policy where the development of a self-build plot would not lead to adverse effects on biodiversity, landscape, heritage, and flood risk. This may encourage self-build proposals on an ad hoc basis fulfilling needs which cannot be met through the Local Plan especially within rural areas. The approach would also increase the level of windfall development achieved during the plan period.

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<p>Creeting and Coast (Fairlie, Mr John) 1217415</p>	<p>Paragraph 63 of the NPPF states: Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). Page 68 of the NPPF defines Major Development as: For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. The affordable housing provision should therefore be zero for sites of less than 10 units.</p>	<p>Agreed -</p> <p>Rec Amend the policy to make clear that lower site size thresholds will only apply in Designated Rural Areas</p>
<p>Fennell, Mr David (Homes for Wells)</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: (Support with Conditions) Homes for Wells Housing Needs Survey published 2018 showed an immediate requirement for 33 extra affordable homes. The previous five-yearly survey showed very similar results. The main differences were that the percentage of second homes and holiday lets has since risen to over 30%, house prices have accelerated even faster while wage growth was almost static and the main social housing provider is tending to sell off its dwellings in Wells. Homes for Wells is valiantly trying to grow and will meet demand to the extent that land and grants are available. Extrapolating the results of the Housing Needs Surveys, it is reasonable to expect that at least the same level of need will be demonstrated again in the next three five-yearly Housing Needs Surveys. Therefore, over the 20 year period of the Local Plan, the requirement for affordable homes is most likely to be in the region of 90 to 120 dwellings. Even in the event of a major cyclical downturn in the housing market, the least impact will be in smaller, family homes, because the shortage of smaller homes is greatest, and demand is inflexible...." In 9.6...." a significant proportion of the limited number of new homes....will be subject to affordable housing occupancy restrictions".....The key question here is what is considered to be a significant proportion? In 9.6 the fear is expressed that the imposition of permanent occupancy conditions would deflect demand for second homes on to the existing stock. The counter argument is that "it is better to do what is possible, rather than to do nothing". Given the growing scale and urgency of the problem, we feel it is essential to do something - the reason why Homes for Wells was originally set up. In 9.7 infill growth is allowed on brownfield sites. In our Housing Needs Survey, the derelict units at Maryland were commented on by many responders. We are aware that the Flood Defence Agency opposes any development in this area but respectfully point out that there are many coastal areas where development takes place in flood risk areas - the homes have parking on the ground floor and the only inhabited parts of the dwelling are on the first floor or above. In 9.8 the Council...would welcome comments on this area of policy. Homes for Wells supports housing growth from many different sources and believes that a variety of smaller developments is preferable to any single large site, in</p>	<p>Comments Noted. Policy HOU2 sets out the affordability requirement of 35%. Development in flood risk areas is subject to the sequential approach and exception tests as set out in national policy where those areas least at risk are prioritised. Second homes occupancy restriction are unlikely to be effective for the reasons outlined in the report.</p> <p>The Council is actively supporting the provision of rural exception sites and affordable housing provision through grant funding and working with local communities in the identification of and delivery of sites to address local need. Such sites can also be brought forward through the emerging neighbourhood plan. The use of a second home is not defined in planning legislation, the occupation of residential dwellings is not a matter of land use planning and there are no planning controls that can be utilised to control the use of the existing housing stock as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers where there is an opportunity to bring forward additional growth in response to local issues and evidence.</p>

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	<p>terms of access on foot or bicycle to the town centre, limiting damage to wildlife and the natural environment and avoiding intrusion into the landscape.As to the impacts of second home ownership, the first is that parts of Wells are increasingly becoming 'dark' out of season; people no longer have neighbours, businesses no longer have customers, school numbers fall, family members move away to find work or affordable homes and the permanent population falls. The second is that, in high season, the isolated residents are disturbed at all hours of the day and night by strangers driving in and out; nobody knows who their neighbours are; in daytime, the roads gridlock and all available parking is taken; in short, the income and employment gained from tourism has to be smoothed out over the year. Providing more second homes for holiday lets in peak season does not smooth out the pressure - it adds to it - and it undermines the community and its services outside peak season</p>	
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<p>EJW Planning Ltd Whettingsteel, Mrs Erica (Fleur Developments Limited)</p>	<p>Support the principle of introducing a sliding scale for affordable provision. However, the figures set out in the table do not allow sufficient flexibility to meet local needs. It is appropriate in North Norfolk that affordable housing targets allow for greater flexibility in respect of the scale of development proposed and affordable housing contributions sought on the basis of a sliding scale however, the figures set out in the table do not allow of sufficient flexibility to suit local needs</p>	<p>Support (partial) welcomed: The Council aims to ensure that the dwellings built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes, which are built with the identified need for homes of different sizes and tenures. The policy indicates that tenures will be determined on a case by case basis to match local need and provide for an appropriate degree of flexibility. However some further clarity in relation to permissible affordable tenures is desirable.</p> <p>Rec To be made at the meeting following further discussion with Housing enabling</p>
<p>Savills, Voyias Ms Lydia (Holkham Estate)</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Holkham Estate is supportive of the ‘Build to Rent’ concept. The Planning Practice Guidance states: “As part of their plan making process, local planning authorities should use a local housing need assessment to take into account the need for a range of housing types and tenures in their area including provisions for those who wish to rent. Specific demographic data is available on open data communities which can be used to inform this process. The assessment will enable an evidence-based planning judgement to be made about the need for build to rent homes in the area, and how it can meet the housing needs of different demographic and social groups. If a need is identified, authorities should include a plan policy setting out their approach to promoting and accommodating build to rent.” Paragraph: 001 Reference ID: 60-001-20180913 (Revision Date: 13 09 2018). The North Norfolk District Council Strategic Housing Market Assessment (June 2017) provides commentary about the private rented sector (PRS) across Central Norfolk over the period 2001 to 2011 at pages 86 and 87. It is stated at paragraph 4.57 that “The rate of increase in the PRS is revealing: over the period 2001-11, the PRS sector in Central Norfolk has grown by 45%”. It is stated at paragraph 4.58 that “It is important to recognise that the private rented sector in Central Norfolk is growing via the conversion of other tenures rather than new build.” The SHMA indicates that there may be a need to accommodate additional growth to specifically respond to the growth of private rented sector. Unfortunately there is no analysis of the Private Rented Sector within the North Norfolk District in isolation. The Draft North Norfolk District Council Draft Local Plan is silent in</p>	<p>The Council supports the provision of rented accommodation in meeting the identified need for both market and affordable housing. A high proportion of affordable rent is included in the plan wide viability testing.</p> <p>Recommendation: Add specific reference to the supporting text of the policy acknowledging the contribution that build to rent can make.</p>

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	<p>respect of ‘Build to Rent’. Build to rent is defined within the National Planning Policy Framework (Glossary) “Purpose built housing that is typically 100% rented out. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.” The concept of ‘Build to Rent’ is different to traditional development schemes where houses are built for sale. This sector of housing can play a role in accelerating delivery where there is a particular need for rental properties</p>	
<p>Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford)</p>	<p>Respondents to the questionnaire, (clarification added, Wells NP survey) counted 125 first preferences for affordable housing for rent by local people, 89 second preferences and 24 third preferences. By contrast houses for sale on the open market attracted 14 first preferences, 9 second preferences and 5 third preferences. The survey response reflects concerns about the very limited amount of land available for affordable rental accommodation. This could be resolved if all sites are designated "exception sites".</p>	<p>Comments noted. Addressing housing needs, both market and affordable is an important consideration in meeting all identified housing needs across the district and contributing to a balanced and sustainable community. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers to bring forward additional sites to support local affordable housing where they are justified by appropriate evidence.</p>

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<p>Larkfleet Homes, Dew, Miss Charlotte</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Larkfleet object to the stringent nature of policy HOU2 and suggest that there is a greater need for flexibility to ensure development is viable on a site-specific basis and believe housing mix percentages should be addressed on a case by case basis. As an example, the number of required self-build and specialist properties, defined in this policy as a need, should be weighed against the need for affordable homes.</p>	<p>Not agreed. The Council aims to ensure that the dwellings built reflect the identified need. The aim of Policy HOU2 is to closely match the type of homes, which are built with the identified need for homes of different sizes and tenures. The Strategic Housing Market Assessment (SHMA) provides information in relation to the number and type of homes required, including their size and tenure. It concludes that there is likely to be high levels of need for two and three bedroom properties and a growing need for single bedroom homes and flats in the affordable sector. Also, meeting the housing needs of an aging population, in terms of the traditional housing stock and specialist types of elderly care will become increasingly important throughout the Plan period.</p>
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<p>Persimmon Homes (Anglia), Saedi, Mr Kian</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Persimmon Homes (Anglia) request that the discrepancy between the housing mix requirements of HOU2 and other relevant policies within the plan are revised so that they align:</p> <ul style="list-style-type: none"> • HOU2 does not require the provision of specialist elderly/care provision on schemes of between 26-150 dwellings with the trigger for the provision of this type of accommodation being 151 dwellings and up. However, this is inconsistent with Site Policy DS13, which requires the provision of land for elderly accommodation despite the allocation including only 150 dwellings, which would not trigger the need to provide elderly accommodation under Policy DS13. • Persimmon Homes (Anglia) acknowledge the role that self-build housing plays in meeting the needs of groups with specific housing requirements, but consider that self-build housing is likely to be more appropriately delivered as part of smaller housing schemes or housing schemes that are exclusively self-build. Persimmon Homes (Anglia) therefore suggest that a more appropriate approach would be for the plan to include a separate policy, specifically supporting the delivery of self-build housing where it can be demonstrated that self-build housing would be appropriate to its locational and developmental context. • Persimmon Homes (Anglia) consider that the imposition of a requirement to provide a certain proportion of self-build plots on larger schemes (26 +) is not necessary or the most appropriate mechanism to meet the demand for self-build and custom housebuilding in the North Norfolk area, particularly given the most recent self-build registers (2017 & 2018) indicate demand has generally been for single plots in more rural locations and that the level of demand has been low. Therefore, Persimmon Homes (Anglia) consider that the requirement is likely to result in self-build plots being provided in locations where there is not a demand for self-build plots, which would potentially result in self-build plots being left empty where they are not sold. Additionally, this could reduce the overall number of houses that could otherwise be delivered on an allocated site by the developer. 	<p>Agreed that consistent approach is required. Recommend that the policy also includes a site size threshold (hectares) in addition to the number of dwellings proposed.</p> <p>Rec . Add a site size threshold in addition to a number of dwellings to Policy HOU2 in relation to elderly care and other requirements.</p> <p>Partly agreed. The Plan requires self-build within large proposals and would allow for/support self-build in other sustainable locations through Policies SD2 and SD3. More explicit text about the support for self-build can be included within these policies.</p> <p>Rec. Incorporate support for self-build in Policies SD2 and SD3.</p> <p>The requirements are set at very low levels (just 2%) reflecting the evidence of need. It is agreed that the supporting text of the policy should explain how such plots might be released in the event of no demonstrable demand for self-build in the area.</p> <p>Rec. Add appropriate wording to the supporting text allowing for the disposal of self-build plots after a period of two years of continuance agreed marketing.</p>
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	<ul style="list-style-type: none">• Persimmon Homes (Anglia) also echo the recommendations of the HBF in that if the self-build element of the policy is retained it must include a mechanism for the return of self-build plots to the developer where these are unsold. It is important that plots should not be left empty to the detriment of neighbouring dwellings or the development as a whole. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.”	
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<p>Taylor Wimpey UK Ltd, Hewett, Mr Daniel</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Taylor Wimpey UK Ltd consider that the Council should seek to provide a range of housing tenures, in accordance with the most recently published SHMA, and that the precise percentage of housing mix should be dealt with on a case by case basis and be informed by site location.</p> <ul style="list-style-type: none"> • When allocating sites that are controlled by developers or notable house builders, these should be viewed favourably as this would significantly de-risk the site in terms of deliverability. • It is considered that, if allocated sites are not coming forward at the anticipated rate of the adopted housing trajectory or if the Council is unable to demonstrate a 5 year housing land supply, this should trigger the delivery of the reserved sites for consideration. This would ensure that the Council are meeting their housing need, whilst also ensuring that housing is coming forward in the most sustainable locations, as this would have been a factor in determining the location of the reserve sites. Mechanisms to avoid a shortfall in housing development and delivery are vital to consider at this stage of the emerging Local Plan. <p>Taylor Wimpey UK Ltd object to the prescriptive nature of policy HOU2. Greater flexibility on a site by site basis is required to ensure schemes are viable. For example, the need to provide self build plots and the provision of specialist elderly/care beds in accordance with this policy needs to be weighed against the need to provide the prescribed level of affordable housing. As required by National Planning Policy, we consider that the Council should seek to provide a range of housing tenures, in accordance with the most recently published SHMA, and that the precise percentage of housing mix should be dealt with on a case by case basis and be informed by site location.</p>	<p>Not agreed, site by site negotiations absent a specific policy requirement are likely to prove extremely difficult to implement and risk identified needs not being addressed.</p> <p>Not agreed. National guidance already includes a suitable mechanism for the release of sustainable development sites in the event that no five year land supply is demonstrated.</p> <p>Not agreed, The Plan provides for all identified needs and has been viability tested. It should <i>not</i> be the case that one type of provision is weighed against or offset by another – <i>all</i> are required and these requirements should inform site value and viability considerations. Government policy is clear in that the policies of adopted plans are expected to be reflected in land purchase price and as such developers should take account of the policies in developing proposals and negotiating land sales.</p>
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<p>Tetlow King Planning, Rossiter, Meghan, for Rentplus UK Ltd</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Rentplus UK Ltd supports the Council’s aspiration to deliver more affordable housing across North Norfolk. This should translate to the supporting text and policies supporting the delivery of the full range of affordable routes to home ownership, including rent to buy, such as at para. 9.25. The affordable rent to buy tenure meets needs for affordable rented housing, with the full expectation of purchase. We support the Council in setting a separate minimum target for the delivery of affordable housing over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.</p> <ul style="list-style-type: none">• Rentplus UK Ltd provides affordable rent to buy housing, through a ‘rent - save – own’ model, renting at an affordable rent, set at the lower of 80% market rate (affordable rent) or LHA and a gifted 10% deposit upon purchase, with options to purchase at years 5, 10, 15 and 20. The main difference to other affordable options is that households are able to save for the mortgage deposit while renting the same home. The inclusion of affordable rent to buy provides greater choice and flexibility. The affordable rented period provides security of tenure, with management and maintenance by a local partner Housing Association (HA) and the opportunity to save towards purchase. Two supporters of the model are Plymouth City Council and Sedgemoor District Council.• The SHMA is out-dated in assessing affordable housing need in light of the amended definition of affordable housing in the NPPF (2019). It is important for the Council to consider seeking an additional review of local affordability and how these new tenures can help to meet the wide range of local housing needs. As this Plan will be tested against the new NPPF it is important that the evidence base assesses the need for and potential provision of such housing in order to effectively plan to meet those needs. This differs from the models of low cost home ownership set out in the 2017 SHMA.• The Rentplus model offers the opportunity for the Council and local HAs to diversify the housing offer to meet local housing needs without recourse to public subsidy, helping to reduce the housing waiting list and assisting households in other affordable tenures to move on with rent to buy, freeing up those homes for others in need.• The Council should consider the opportunities that exception sites may offer in delivering more affordable housing in areas not covered by AONB designation, as part of Policy HOU 2. This may increase the delivery of affordable housing over the plan period without adding to the numbers of open market housing that may need to be delivered. In	<p>Noted: The policy does not prevent the delivery of affordable homes under the Rentplus model or include a specific limiting definition of affordable homes thus allowing for a range of tenure types provided it is shown that these products are affordable and meet a local need. However it is agreed that the requirement to deliver 10% low cost ownership with all remaining affordable homes being provided as rented may be too prescriptive and prevent the delivery of other usefully affordable products.</p> <p>Rec. Agree a revised affordable housing mix with the housing enabling team and consider if it is desirable to include this within the policy. Final rec to be made at the meeting.</p> <p>The Plan includes an exceptions policy (HOU3) which allows for exceptions developments across the District.</p>
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	<p>Policy HOU2 the expectation that ‘not more than’ 10% ‘low cost home ownership’ housing is to be delivered on major residential developments is inconsistent with the NPPF which expects ‘at least’ 10% affordable home ownership to be delivered. This element of the policy should be amended to refer to ‘affordable housing for sale, including other affordable routes to home ownership’ as this would widen the scope of the policy to allow for delivery of the full range of ownership options. The percentage cap should also be removed in favour of figures that best reflect local needs, suggested by Footnote 1 of the table. The emphasis on meeting local affordable needs for rented accommodation can be met through a combination of social and affordable rent, and affordable rent to buy. We recommend that the Council include reference to rent to buy within the policy.</p>	<p>Not agreed. Use of the term ‘at least’ allows for the possibility that all affordable homes would be provided as low cost home ownership. The evidence clearly shows a much greater need for social and affordable rented properties hence the term ‘not more than 10%’ which allows for the delivery of ‘at least 10%’ as required by the NPPF.</p>
<p>Firs Farm Partnership Lanpro Rejzek, Ms Becky</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Draft Policy HOU2 sets out strict requirements for the mix of house sizes and tenures on a development site including in some cases requirements for serviced self-build plots and specialist elderly care provision. It is considered that this policy is overly prescriptive and there needs to</p>	<p>Not agreed. The Policy is evidence based and needs to provide a clear basis for reaching decisions. Site specific and local derived evidence at the time of application can be taken into account when decisions are made.</p>

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	<p>be the ability to give consideration on an individual site basis as to whether there is an identified need for self-build plots, elderly care in a particular location.</p>	
<p>Duchy of Cornwall Pollock, Mr Nick</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The landowner supports development at Fakenham. However, alongside this, the Plan should ensure that the needs of the rural areas of the District, such as affordable housing, are considered and adequately met to ensure the fostering of thriving communities. This would support a positively prepared plan that is justified and sound. Supports provision of new housing to meet local need and acknowledges that the housing need figure of 543 per annum is consistent with the national Standard Method. Recognises the need for a mix of housing in new developments to ensure balanced communities are created and maintained, and to ensure needs of all population groups in the District are adequately met. However, the policy should not be overly prescriptive to ensure there is flexibility to respond to the changeable market situation and any changes in the District’s demographics over the Plan period. Policy HOU2 should encourage all different routes to affordable housing to ensure those in need have the best access possible to affordable housing. This would also ensure consistency with the updated NPPF which is much broader in defining affordable housing (paragraph 62 and Annex 2). Policy language should be consistent with NPPF paragraphs 62-64. Exemptions, including those for self-build, should be identified as per NPPF paragraph 62, and vacant building credit should also be referenced as per paragraph 63. There is also ambiguity regarding the “agreed dimensions” in table footnote 2 – what are such agreed dimensions and how are they justified? With regard to the different affordable housing zones, NNDC should ensure this responds to previous affordable housing delivery trends, so that affordable housing is delivered in areas of greatest need. The supporting text of Policy SD3 notes that larger towns have the greatest need for affordable housing, but also have the greatest supply. However, care should be taken to ensure that the affordable housing needs of village and rural communities are not neglected, particularly those with high demand and low land availability, such as Mundesley. While Background Paper 2 - Distribution of Growth states there is greatest demand for affordable housing in the Large Growth Towns, there does not appear to be any evidence to support this notion and affordable delivery rates in these areas are not discussed. NNDC must be certain that affordable housing can be</p>	<p>Support noted. Consider a more flexible requirement in relation to affordable homes to allow for a broader mix of affordable predominantly rented products.</p>

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	<p>successfully delivered in areas of greatest need to ensure a justified and effective Plan. Sites like F03 (Fakenham) can, of course, help support such delivery in the short term.</p>	
<p>Pigeon Land Ltd. and JM Clifton, JM Clifton, ID Clifton</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Formulated based on the SHMA and other evidence base documents. It identifies site C10/1 being located within Affordable Zone 2 and cross references tenure mix dependent on the size of scheme. We support the policy and confirm that the Concept Masterplan, which accompanies this submission provides for a scheme that complies with policy HOU2, notably the provision of 35% affordable housing and the requirement for 50% of market homes to be two and three bedrooms. The Council may, however, wish to consider amending the policy to provide flexibility in order to reflect housing needs in the District over the life of the Local Plan. Policy HOU 2 also requires at least one plot or 2% of the total number of units to be provided to be self-build. We support the aspiration to increase the delivery of new homes through the provision of self-build and custom-build housing and Pigeon are involved in a number of schemes that include self-build plots and confirm that these can be provided as part of site C10/1. However, the Council may wish to consider amending the policy to allow any plots that are unsold after a period of time to be brought forward as conventional housing.</p>	<p>Support noted. Consider comments in the development of the policy as above.</p>

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<p>Home Builders Federation Behrendt, Mr Mark</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: It will be important that the affordable housing policy reflects any updated evidence on viability taking into account all the additional costs resulting from the new local plan. This may require the Council to reduce its requirements in both areas to ensure that the Council can satisfy paragraphs 34 and 57 of the NPPF. We would suggest that the affordable housing requirement in zone 1 does not reflect the Council’s evidence. The table at paragraph 5.4 suggests that a 15% affordable housing requirement on residential development in the low value submarket will make brownfield land unviable and could have an impact on the delivery of green field sites. In order to ensure compliance with paragraph 57 the evidence indicates that a 10% requirement would be most appropriate and reduce the need for negotiation in zone 1. Would also support the delivery of brownfield sites in the lower value zone and ensure the Local Plan is consistent with paragraph 117 of the NPPF.</p> <p>The requirement for development from 6 units upwards to contribute to affordable housing provision regardless of location is contrary to paragraph 63 of NPPF which states that the lower threshold can only be applied in designated rural areas. Whilst there are parts of North Norfolk that will be designated as a rural area it cannot be applied to the entire borough. The policy should therefore identify the designated rural area to which the lower threshold will be applied. Outside of the designated rural areas contributions should only be applied to major development. Recommendation The Council will need to reconsider its affordable housing requirements against a revised viability assessment that considers the cumulative impact of the policies in the local plan. The policy will also need to be amended to remove the requirement for small sites outside of designated rural areas to pay a contribution towards affordable housing provision.</p> <p>Policy HOU2 requires developments of 6 or more units to provide no less than 50% of the market homes as either 2 or 3 bedroomed units. Firstly, the mix of market homes to be provided on each site should be a matter for the developer to consider, who understand the market for new homes and what is needed within the location they are developing. Whilst the Council should seek to ensure a broad mix of housing is provided across the Borough this should be achieved through allocating sites that will achieve this mix. Whilst we do not agree with the imposition of a mix requirements on market housing on any sites it is even more onerous on smaller sites where development viability can be greatly affected by the mix if there is no market for such homes at the location the development</p>	<p>Not Agreed. Affordable housing thresholds and requirements are set at a level supported by the evidence and will ensure that the strategy as a whole is deliverable. The Council accepts that some sites may not be viable.</p> <p>Agreed.</p> <p>Rec. Amend the policy to bring it in line with NPPF requirements making clear that site size thresholds of below 10 dwellings will only be applied in Designated Rural Areas. (most of rural North Norfolk)</p> <p>Not agreed. The mix of market homes is determined by the evidence and is not unduly prescriptive</p>
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is being delivered. **Recommend that the housing mix requirements for market homes in HOU2 are deleted.**

HOU2 requires at least 1 plot or 2% of the total number of units provided to be self-build. Whilst the HBF is supportive of the **self and custom house building** industry we are concerned that the expectation to deliver such plots is being placed on the house building industry. PPG sets out in paragraph 57-025 a range of approaches that must be considered to support the delivery self-build plots, such as examining whether delivery could be achieved on their own land or if their landowners willing to provide development land specifically to support the self-build market. **The Council will need to provide evidence as to the extent they have considered delivery through other mechanisms** if this policy is to be found sound. In addition to considering how to deliver plots for self-builder **the Council must also provide evidence as to the demand for such plots.** We are particularly concerned that across the Country the level of need outlined on self-build registers is inflated and does not reflect demand. We have noted that when Councils have revisited their registers in order to confirm whether individuals wish to remain on the register numbers have fallen significantly. This has been the case at the EIP for both the Hart and Runnymede Local Plans. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the numbers of interested parties on the register fell from 155 to just 3. There are also concerns that self and custom build registers alone do not provide sufficient evidence with paragraph 57-011 of PPG requiring additional data from secondary sources to be considered to better understand the demand for self-build plots. In particular we are concerned that planning policies, such as the ones proposed in the draft local plan, will deliver plots on major house building sites whereas the demand for self-build plots may be for individual plots in more rural locations. Without the necessary evidence to show that there is demand for self-build plots on such sites the policy cannot be either justified or effective. **The Council will need to provide further evidence if it wishes to take this policy further. Without the necessary evidence the policy must be deleted.** If the policy is retained it must include a mechanism for the return of self-build plots to the developer where these are unsold. It is important that plots should not be left empty to detriment of neighbouring dwellings or the development as a whole. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.

Partly agreed. The Plan requires self-build within large proposals and would allow for/support self-build in other sustainable locations through Policies SD2 and SD3. There is no reason why larger development proposals should be exempt from self-build obligations. More explicit text about the support for self-build can be included within the other policies of the Plan.

Rec. Incorporate support for self-build in Policies SD2 and SD3.

The requirements are set at very low levels (just 2%) reflecting the evidence of need. It is agreed that the supporting text of the policy should explain how such plots might be released in the event of no demonstrable demand for self-build in the area.

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<p>National Custom and Self-Build Association</p> <p>Foxley Tagg Planning Ltd</p> <p>Ms Sally Tagg</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NaCSBA’s mission is to substantially increase the number of people able to build or commission their own home and they believe that opportunities should arise for prospective self and custom-builders through the Local Plan process. The Self-build and Custom Housebuilding Bill is an Act of Parliament. This Bill seeks to establish a register of prospective custom builders who are seeking a suitable serviced plot of land and requires LPAs to keep an up to date register of people within the district that wish to build their own home. NaCSBA are pleased to note that North Norfolk do keep a self-build register and that demand identified through the self-build register is published. It is however a concern that at present one cannot register on the North Norfolk Self-Build Register at http://localselfbuildregister.co.uk . The lack of presence on this website can give the impression that the LPA does not have a self-build register, and may send the wrong message in respect of the Council’s commitment to the register and to custom- and self-build. Comments from the Planning Minister alongside the Right to Build legislation clearly demonstrate how the government intended LPAs to respond to the requirements set out in the NPPF when drawing up new Local Plans. LPAs should take a proactive position to providing land and should undertake rigorous and effective evidence gathering to measure custom and self-build need in their districts. And LPAs that do not do so can expect their Local Plans to be found unsound at examination. The Housing and Planning Act 2016 conferred on LPAs the responsibility to: “Give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom house building in the authority’s area...” The Act established that evidence of such demand would be provided by registers which LPAs are required to keep in accordance with the 2015 Self-Build and Custom Housebuilding Act. The Housing White Paper entitles ‘Fixing Our Broken Housing Market’ published in February 2017 stated that: “the Government wants to support the growth of custom built homes. These enable people to choose the design and layout of their home, while a developer finds the site, secures planning permission and builds the property.” The paper further went on to acknowledge that: “The main barriers to custom built homes are access to land and finance.” Finally, the paper demonstrated the importance with which the Government treats provision of self-build opportunities by councils by stating that: “If we do not believe local authorities are taking sufficient action to promote opportunities for custom-building and self-building, we will consider taking further action including possible changes to legislation.” More recently, Housing Minister Kit Malthouse stated in the House of Commons (13th May 2019) that: “Self and custom builders have a vital role to play in delivering new homes that are welcomed in their communities, rather than</p>	<p>Noted – The Policy provides for a modest supply of self-build opportunities. New self- build proposals would be supported via the Plans wider support for windfall developments provided such proposals were sustainably located.</p>
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resisted, and built to last.” He went on to state that: “Custom and self-build can and should be a mainstream housing option in this country.” Paragraph 61 of the revised NPPF sets out the requirement for LPA to plan for a wide choice of high quality homes to support sustainable communities and provide greater opportunities for home ownership. It goes on to state (underlining is our emphasis): “The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).” Furthermore, the NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. Critique of policies Whilst the plan does make reference to custom and self-build in Policy HOU 2 – Housing Mix, in the form of a requirement for medium and large sites to deliver 2% of units (or at least 1 plot) as serviced self-build plots, this is the sole reference to custom and self-build in the plan. As such, the opportunities for those wishing to build their own home might be limited, given that the only plots that the local plan will help to deliver will be those on large sites. Plots on large developments do not always suit the needs of prospective custom and self-builders, and consequently more choice should be offered, with smaller sites being facilitated too. It is concerning that no other mention of custom and self-build is made within the plan. Given the emphasis that the government wishes to place on custom and self-build it is considered crucial that housing policies within the emerging plan make reference to the fact that LPAs have a duty to meet the needs of those wishing to build their own homes. It is therefore considered appropriate that **policy HOU2 should be adjusted in order to ensure that it is made clear that self-build is supported and actively encouraged to come forward through windfall sites.** As such there is currently no provision within the plan to ensure that the needs of those wishing to build their own home are met, unless those prospective self-builders want a site on one of a handful of large sites expected to be brought forward during the plan period. The NPPF makes clear how small and medium sized sites can make an important contribution to meeting the housing requirement of an area. The identification and positive promotion of small and medium sites as per the NPPF paragraph 61 can be promoted in order to support the needs of custom and self-builders. North Norfolk DC **should give serious consideration to a policy which encourages small and medium sites**

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	<p>specifically to meet the needs of custom and self-builders. At present NaCSBA are concerned that the emerging Local Plan does not meet the needs of those wishing to build their own home, does not meet the council’s responsibilities in this regard and could not be considered sound at examination as a result. Conclusion The Local Plan does not support custom and self-build other than limited provision on a small number of large sites. Policy HOU2 should be altered to make clear that custom- and self-build proposals within the district are encouraged and will be supported in order to comply with the NPPF, the Housing & Planning Act and the Right to Build.</p>	
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<p>Norfolk Homes Ltd/Norfolk Land Ltd Presslee, Mr A</p>	<p>Issues and concerns were raised at the Council-run Viability Workshop (29 August 2018) about the basis and assumption by NCS (authors of the Plan Wide Viability Assessment, July 2018). Errors and omissions were identified but it is unclear if/how those have been addressed. Consequently, there must be question-marks about the conclusions drawn and therefore the basis of the - in particular – 35% affordable housing level proposed by the draft Plan in Affordable Housing Zone 2. It is evident that a substantial proportion of proposed allocations (notably in North Walsham and Fakenham) are in Affordable Housing Zone 1, meaning that proportionately lower affordable housing rates will be delivered, even from the large allocations proposed therein. We have - elsewhere through this consultation exercise – indicated that there should be a better distribution of proposed housing allocations, particularly within the Large Growth Towns and Small Growth Towns categories of the Settlement Hierarchy (including an additional allocation in Hoveton). This point is reinforced by the implications thereof – as proposed by the Draft Plan – insofar as affordable housing provision is concerned: some redistribution away from single large allocations in Zone 1 towards Zone 2 will result in an increased provision of affordable housing. The Housing Incentive Scheme introduced by the Council was both innovative and effective. It is our view that its 25% level of affordable housing – which proved so effective in securing early delivery of housing (both market and affordable) should be maintained in Zone 2 through the new Local Plan.</p>	<p>The council took on board comments made at the viability stakeholder event, a revised study informed the emerging policies and was republished alongside the draft plan consultation documents. Detailed feedback including the revised costings are included in the Interim consultation statement Appendix L. and the study is available in the Councils web site. Following the event, the study appraisals were subsequently re run with updated assumptions in relation to the suggestion of increased build costs along with a review of other inputs. The revised costs are based on independent data provided through BCIS as advised in the updated Planning Practice Guidance plus a percentage allowance for additional external costs. A further £10 sqm is added for category 2 Accessible and adaptable housing. Section 106 contributions were reviewed in light of the additional inclusion of costs for externals and in line with the updated and refinement of the policy requirements in the emerging allocations. A 17.5% developers profit is used, reflecting the reduced risk of building in North Norfolk as agreed at the meeting. The revised study also reflects the areas of higher value areas outside the main indicative zones. The affordable housing mix was reviewed to ensure it remains NPPF (July 2018) compliant and reflect the more realistic requirements of North Norfolk. The larger strategic typologies include a requirement for flats which are now based on the lower national space standard of 50 sq m for a 1 bed rather than a 2 bed. Sales values, fees, finance etc were not at this stage reviewed, given the iterative nature of plan making further work in refining values as well as costs will be undertaken at a stage to inform policy development. The study clearly identifies different affordable housing zones.</p>
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		<p>The distribution strategy and settlement hierarchy is based on comprehensive evidence considering a wide range of factors not just the need for affordable homes</p>
<p>Trinity College Cambridge Define Planning & Design Clifton, Ms Kirstie</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The policy proposes a significantly reduced proportion of affordable housing in conjunction with residential developments compared to the current Core Strategy (adopted Policy HO 2 requiring 45% for developments of 10 dwellings or more), based upon their location within the District. Within Fakenham the policy proposes at least 15% affordable homes are provided. This is considered to be more representative of the viability of development in this location. As such, support this approach on the basis that all development will remain subject to the normal viability tests and, therefore, treated on a site-by-site basis. In practice the policy may result in the viability of development being tested only in exceptional circumstances, however, the residual potential need for a viability appraisal should remain explicit within this policy.</p>	<p>Support noted.</p> <p>The Council does not consider it appropriate to include the possibility of viability testing in the policy itself. Government advise is that such application based testing will rarely be justified unless there has been specific and demonstrable changes since Plan preparation.</p>

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<p>White Lodge (Norwich) Ltd Lawson Planning Partnership Oelman, Ms Kathryn</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The Local Plan acknowledges that affordability is an issue throughout the district. In order to address this, Policy HOU2 (Housing Mix) seeks to ensure that small sites of 6-25 dwellings provide either on-site or off-site contributions to affordable housing, dependent upon whether their provision exceeds 10 dwellings or not. HOU2 restricts mix and applies affordable housing requirement. Difficult to identify which zone the Former Nursery site lies. Paragraph 9.26 of the draft local plan describes how, to date, it has only proved possible historically to achieve 18% affordable dwellings on new development sites. Paragraph 9.27 explains that 20% is a rate which is supported by the current evidence base. It is therefore unclear how provision levels of 15-35% have been arrived at, and are thus necessary or justified, other than the fact they are the maximum viable levels arrived at in the NCS Interim Plan Wide Viability Assessment. Paragraph 63 of the NPPF directs that affordable housing should “only be sought on major developments of ten dwellings or more”. Central government’s approach acknowledges that critical viability issues are commonly experienced on smaller sites. Their delivery is therefore encouraged by relaxation of the affordable housing requirements, as these sites make an important contribution to meeting the housing requirement of an area. HOU2 restricts flexibility in the mix to be provided on smaller sites. Restrictions in Policy SD3 are justified to meet paragraph 68 targets and ensure densities proposed reflect the rural character. However, we remain unclear as to how thoroughly the impact of these restrictions has been assessed: the NCS Viability Assessment does not specifically evaluate these constraints in combination. Thus, we are concerned that the approach adopted will not be an appropriate solution to meeting the identified affordable housing need in the District, as it will not encourage small sites to be brought forwards due to viability concerns in Small Growth Villages. We therefore raise objection to the housing mix requirements of Policy HOU2 regarding sites of 6-25 dwellings on the basis that it is not consistent with approach advocated in national policy, which would suggest that no forms of affordable housing should be sought on sites comprising 0-9 dwellings. Failure to address this inconsistency raises potential issues for the legality of the plan and its soundness. We also request that a separate viability assessment is commissioned to examine the policy interaction on small sites in Small Growth Villages, to ensure the plan is effective in meeting the identified affordable housing need on a District level.</p>	<p>Agreed.</p> <p>Rec. Amend the policy to bring it in line with NPPF requirements making clear that site size thresholds of below 10 dwellings will only be applied in Designated Rural Areas. (most of rural North Norfolk)</p> <p>Threshold site sizes and affordable requirements have been tested for viability across the full range of site sizes and types included in the proposed strategy and whilst it remains possible that some sites may not be viable the test required is to ensure that the strategy, when taken as a whole, is deliverable.</p>
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Representations from Individuals

Who	Type of representation	Representation	Officer Comments and Recommendations
Addison Elaine	Object	I would urge NNDC to place a 45% obligation for affordable and social housing within this enormous development, along with a legally enforceable lock-in from the developers to deliver on this requirement.	The viability evidence indicates that affordable requirements of 45% would not be viable in most of the District.
Carr, Mrs Elizabeth	General Comments	There is a waiting list of about 3000 people on the housing list in the area I live. Although 'affordable' housing has been built recently some of the properties are still empty because they are not actually that 'affordable'. -More prominence and an active encouragement for self builds. People building their own homes are more likely to want to live in them and live in an area they like	Agreed. Rec.Add explicit support for self build in Policies SD2 and 3.
Woodward, Mrs Josephine	General Comments	Consideration needed for the types of houses for the retired, elderly and those with dementia. Needs to be a clear strategy for the delivery of low cost homes for the young and for those who will need to provide the care for themselves and others.	Agreed. This policy and Policy HOU8 are intended to require developers to construct a significantly greater number of homes and types of accommodation suitable for the elderly and those with particular care needs.

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<p>Edwards, Mr John</p>	<p>Object</p>	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Policies HOU 2 and HOU 3 are not sufficiently sensitive to the special needs of Wells; more closely aligned with Blakeney and other coastal villages along the North Norfolk Coast.</p> <p>The attraction of this location, together with the nature of employment in Wells, means that there is not enough affordable housing, particularly affordable housing for rent. Local analysis suggest that the current demand for rented housing in Wells is higher than the total housing proposed through the Local Plan. Policy HOU 2 would only require 28 affordable dwellings to be built and this is entirely inadequate.</p> <p>As the target for 80 dwellings is not being challenged in this submission, the housing policies for Wells need further refinement; they need to be more aligned with HOU 3, or there needs to be a separate policy reflecting recognition of the special circumstances in Wells [and any other settlement similarly affected] if a market force outcome is to be avoided, and the demand for local need met.</p>	<p>Agreed that an allocation of 80 dwellings will not on its own address the affordable housing needs of Wells and noted that the respondent does not object to the allocation. Policies SD 2 (Community led developments) and HOU3 (Exception sites) provide support for the delivery of affordable homes to address the needs of the community.</p>
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Swift, Mrs Julie	Object	Affordable homes now seems to relate to "Housing Association" homes only. There are a lot of young people in the area who are in work and do not qualify for (or want) a Housing Association home, but who want to buy a property themselves. As most smaller/cheaper homes are snapped up as holiday lets or second homes there are no properties that they can afford. Prices are artificially raised on properties they might be able to afford as they can be sold for holiday use. The Council must start imposing full time residency occupancy restrictions on cheaper properties to allow them to be purchased by local youngsters or elderly people whose incomes have reduced. They can do this as it states in section 9.4 (under Housing Policies).	Noted and partly agreed. The imposition of principle residence restrictions is unlikely to reduce the value of homes and render them affordable. Policy Hou2 includes a requirement that a proportion of affordable homes built are made available as low cost home ownership. The Planning White Paper reforms, if introduced, will require 20% of affordable homes to be provided as discounted first time buyer homes and

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Smith, Mr Mark	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY. Seems to be a positive approach to affordable housing although a larger percentage of low cost home ownership could be beneficial in the long run as home ownership promotes more benefits for the occupiers and greater prosperity in the future for younger residents. Such help from the council may include low cost loans to assist with deposits. Maybe schemes such as Suffolk council undertook where low cost home ownership was available with no deposit and properties bought required completion of bathrooms, kitchens and decorations so to reduce the selling price initially. The mortgage was supplied by the council due to properties without working kitchens and bathrooms not being mortgagable. There was a time frame that the required work had to be completed by but basics would have been acceptable.</p>	<p>Noted. The issues raised are not matters for Local Plan policy. The Council will consider wider initiatives to support the delivery of affordable homes.</p>
Filby, Mr Michael, Partridge, Mrs Lois	Object	<p>The policy identifies two affordable housing zones in the District; Roughton lies within Affordable Housing Zone 1, where the proposed provision is at least 15% affordable homes on schemes of 6-25 units. These zones relate to viability, and do not correlate with the boundary of the AONB. Paragraph 63 of the NPPF states that: ‘Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas.’ The Norfolk Coast AONB covers part, but not all of the District. As drafted, Policy HOU 2 requires provision of affordable housing on sites of 6-25 dwellings across the District, not just in the AONB. This approach does not therefore comply with NPPF paragraph 63. Policy HOU 2 should be amended to only require contributions to or provision of affordable housing on schemes of 6 or more dwellings for sites in the AONB: outside the AONB, the threshold should be 10 or more units, following the definition of major development set out in the NPPF glossary.</p>	<p>Agreed.</p> <p>Rec. Amend the Policy to make clear that site size thresholds below 10 will only be applied in Designated Rural Areas.</p>

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Terrington, Mr Peter	Object	High demand for second homes, retirement homes and properties for holiday letting; the risk is that most new development homes will be acquired for these purposes, being beyond the means of the working population. I am very pleased that the Council has recognised this risk and has attempted to keep the new build allocation, for Wells, to a sustainable level, particularly if the affordable homes target of 35% can be achieved! The viability of this target of course will depend on the sale price of the land. You will recall that with the Hopkins Homes development, at Market Lane, although the developer adhered to the 40% affordable homes allocation, it was necessary to reduce the building code requirements to make the development viable. Due to the chronic shortage of affordable housing, in Wells, for local people, as highlighted in the most recent “Homes for Wells” Housing Needs survey, it is essential to specifically include an Exception Site, in the Local Plan for Wells.	Noted. Support for allocation and 35% affordables welcomed.
Hull, Mrs Alicia	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Any housebuilding in future should be for rent at reasonable rates to provide homes for local people – a return to council housing.	Noted. The Policy aims to deliver a high proportion of affordable/social rented properties but also address the needs for low cost ownership.
Johnson, Mr & Mrs	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. In some areas provision of houses of a certain type / size will encourage second home owners. These types of property should have local occupancy rules to prevent lack of this type for local people.	Not Agreed. Second home occupancy restrictions applied to new homes are unlikely to be effective in controlling the numbers of second homes in the District as such restriction could only be applied to new homes and would increase the demand for such properties in the existing housing stock

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Rose, Mr Alan	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whenever groups of houses are built, consideration needs to be given for a mixed community of social housing. There also should be adaptations made to include those with physical/mental disabilities, not necessarily living together in the same place but being included within the community. The Council could work with charitable organisations to possibly share the costs for the build. Other living considerations should also be taken into account such as fostering with families whose own children have flown the nest and could have rents adjusted for the work they are doing with young children in care. Looking at older people the same thing can be done for them - being included in family situations but who are currently overlooked by the Local Authority.</p> <p>Provide: 1. Social housing 2. First time buyer/affordable housing 3. Supported living in small community plots mixing young and old 4. Design community living into the plans</p> <p>We could take a close look at what's been done in places like Holland where plans are made in a joined up way, thinking about long term health and care needs. But if we don't have our say there's a risk that developers will just squeeze in as many houses as they can as cheaply as possible.</p>	<p>Agreed. The policy provides for mixed communities and includes specific obligations to address the needs for affordable and specialist accommodation</p>
Mr Phillip Duncan	Object	<p>Housing - Affordable – proposed Policy HOU2 The Affordable Housing Zones 1 and 2 as identified in the Draft LP (page 122) are inconsistent with the Zones shown in the NNDC Interim Plan Wide Viability Assessment (2018). This brings into question the reliability of the background information and translation into policy. This affects proposed Policy HOU2.</p>	<p>Noted. Ensure Zones on Map reflect viability evidence.</p>
Bates, Mr & Mrs Clive & Eileen	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Need to make available affordable homes so young people can live in the village and bring up their families, do we need more expensive properties so a % of them just become second homes as has occurred on another large development in the village.</p>	<p>Noted. It is important (and a national policy requirement) that the Plan address both the need and demand for all types of properties</p>
Bluss, Mr Andrew	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: A chronic demand for a greater proportion of social housing and/or affordable homes for first time buyers. Developers are only obliged to provide a small number of these type properties for those people requiring them. How is that to help the residents of North Walsham who need that type of housing? Developers</p>	<p>Agreed. The Council intends to set affordable housing requirements at the highest level which is viable. All needs, not just those for affordable homes should be addressed in the Plan.</p>

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		want to make money. There is little appetite/profit margin for the mass building of social/affordable homes.	
Burke, Mr Stephen	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: North Norfolk needs: • More affordable rented homes - at least half of the projected developments • More housing with care to enable our ageing population to continue living independently and with the support they need	Agreed. The policy requires the delivery of affordable homes and specialist accommodation. Policy HOU8 requires that homes built are suitable for lifetime occupancy.
Rice, Mr Colin	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan should be responding to the increase in self-build housing, which provides a route for individuals to build their own home at a more affordable cost than market housing. Remarkably, other than requiring a few self-build sites within the specific Town and Village Proposals, there are no policies in the plan that actively encourage or support this route to home ownership. Whether officially 'market' or 'affordable' housing, self-build is likely to be a method that is actually affordable to those undertaking it, and deserves more recognition in the plan. Although the council's register of interest in self-build may not be currently large, there is large latent interest in self-build. A survey commissioned by the Building Societies Association (BSA), published in October 2011, and quoted in the House of Commons briefing attached, suggested that 53% of people in the UK would consider building their own home given the opportunity	Agreed. Rec Add further support for self-build in Policies SD2 and SD3 of the Plan
Hull, Mrs Alicia	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The pattern of out-of-town car dependent housing schemes, aimed largely for the wealthy and holiday houses and second home owners, with only a few so called 'affordable houses', has been destructive. It has added to pollution and congestion, got rid of green field sites, undermined village communities and made many locals homeless. Change to supporting rental accommodation at reasonable costs, built to minimum construction costs and minimum use of carbon for heating and cooking, and with all costs offset, so there is no overall carbon gain. Use widespread consultation and expert information to help devise the policy.	Noted. Meeting the housing needs of a growing population will require the development of edge of settlement sites. The policy aims to deliver the maximum amount of affordable housing that is viable. Energy efficient construction which reduces carbon emissions is required by Policy HOU11

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Drury, Mrs Margaret	General Comments	I am dismayed at the number of additional homes within the plan. As stated many of these will be taken by retirees into the district and will not be affordable for those working locally. We need many more affordable homes, including homes at affordable rents, for local working people. I would agree with imposing main residency conditions on all new developments.	Noted. To comply with national policy the Plan must address the demand for new homes including for those who wish to retire to the area.
Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent)	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 3.13. Housing need is likely to change throughout the plan period and will vary at a local level. The changing requirements for affordable housing, type and tenure, optional standards, self and custom build, specialist elderly and care provision and other needs should be reflected in policy wording which is flexible and not too prescriptive.3.14. Support the policy. However, housing mix should be informed by local requirements and site specific market indicators as defined in NPPF paragraph 61.3.15. By setting specific requirements at the time of writing, the policy wording proposed particularly Affordable Housing, Required Market Housing Mix and Required Affordable Housing Mix is currently too restrictive. To ensure the Local Plan can accommodate changes in housing requirements up until 2036, policy wording should instead allow for developments to address future need, identified at the time of an application.3.16. Similarly, other than for affordable housing which is zoned, no flexibility is made within the policy to allow for variance in local needs as a result of site specific considerations.3.17. Some degree of flexibility is required to adapt to changing needs over the plan period. To ensure development brings forward the right kind of homes in the right places, policy wording should require development to deliver a mix of housing which satisfies the most up to date housing need assessment, rather than restricting development to the composition table set out in the table.3.19. A similar approach should be applied to ‘specialist elderly / care provision’. Whilst the development plan should prepare for an ageing population, a set requirement for sites which can accommodate in excess of 151 units requiring a minimum 80 bed spaces and further 40 bed spaces for each additional 150 dwellings thereafter is too restrictive and inflexible to change. 3.18. As such, policy wording should read:</p> <p>“Unless the proposal is for a Rural Exceptions Scheme, Gypsy and Traveller accommodation, or specialist(65)residential accommodation all new housing</p>	Not Agreed. It is accepted that local needs will vary over the Plan period. However it is important to establish specific requirements in the Policy to ensure developers have a clear view of planning requirements when purchasing sites. The policy already includes a wide degree of flexibility on types of accommodation which could be provided and comply with its requirements.

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		developments, including those for the conversion of existing buildings, shall provide for a mix of house sizes and tenures in mix of different housing sizes and types, informed by the most up to date needs assessment or other robust evidence, as well as the Borough wide housing mix monitoring target in the table below or any local target set by a Neighbourhood Plan, taking into account site specific considerations.” For a robust Local Plan, which can adapt to changes in need, the table in the policy should be removed, replaced with a broader policy which requires development to address specific housing need such as mix, optional standards and housing for older people according identified need at the time of an application.	
Cuthbert, Mr Andrew	Object	~more attention should be given to making a higher percentage of new builds "AFFORDABLE" . In order that young couples can afford to buy and start their home OWNING journey at the bottom of the ladder. ~can each development in our villages only be allowed with the proviso that a percentage of the dwellings be for sale at an affordable price earmarked ONLY for LOCAL need.	Noted and agreed. The Council already has a policy of local occupancy controls for affordable housing in villages which gives priority to those with local connections
West, Dr Louisa	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More detailed consideration needs to be considered to the needs of 'elderly' people and who is included in this description. Many men and women who have recently turned 60 will not receive their pension until 66/67 or a bus pass. Many will hopefully live possibly another 20/30 years and their requirements for homes and services may well change a few times during	Agreed. The final Plan should include further detail on specific needs and target groups following receipt of the Elderly persons Accommodation Needs Study

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		their remaining lifetimes. Many people 'retiring' are likely to move a few times and have different needs, after retiring. The proposals do not appear to recognise the diversity and changing needs of people of various ages.	
Drury, Mrs Margaret	General Comments	We need many more affordable homes, including homes at affordable rents, for local working people. I would agree with imposing main residency conditions on all new developments.	Partly agreed. The Plan aims to deliver the maximum amount of affordable homes that are viable and includes a very flexible rural exception policy (HOU3) to assist with the delivery of affordable homes. Principle residence restrictions are unlikely to be affective (See report)
Green, Mr Stephen	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan anticipates up to 10,000 new homes over twenty years, of which about 2,000 should be affordable. This is quite wrong. If we need 10,000 new homes then 10,000 of them should be affordable. They should be built by housing associations, local authorities or developers, all of which should be on a not-for-profit basis. We don't need any more large houses which local people cannot afford, we need houses which local people can afford, over which local people should have priority allocation, and which should be a mixture of sale, mixed rent/mortgage, and rent. They should only be available to people who live or work in the District and have done so for a specified number of years, perhaps 2, and all the houses should have irrevocable clauses in them which maintain that residence condition for a specified number of years, at least 20. (Some exceptions should be allowable, for example some houses should always be available for refugees, and for people escaping from domestic violence).	There is a need for all types of homes to address the needs of a growing population. National guidance requires that Local Plans address all needs not just those for affordable homes

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Members for North Walsham Gay, Cllr Virginia	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: This policy is of great relevance to us as it will dictate the level of social, rented housing and low cost market housing available to our constituents. North Walsham is located within Affordable Housing Zone 1. This means that on any site of more than six houses our requirement for on site provision of affordable homes is a minimum of 15%. We are not convinced that this target is high enough to meet the housing need within our town. We would instead favour a target of 30%. We are concerned too that provision for Low Cost Home Ownership must reflect actual levels of income within North Norfolk rather than levels of average income for England as a whole. We would hope to see a higher target for affordable homes and careful oversight of the provision for Low Cost Home Ownership. Special concern to us as it expresses North Norfolk District’s Council’s requirement for affordable housing on larger sites and we have doubted whether this policy truly takes account of the level of our need for social rented housing.	Agreed. Draft policy lacks clarity. Rec To be made at the meeting following further discussion with Housing Enabling Team
Dixon, Cllr Nigel	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Provide more shared equity affordable homes across the District either through schemes with Housing Associations or through a NNDC funded scheme.	Agreed. Policy needs to allow for a mix of tenures. Rec To be made at the meeting following further discussion with Housing Enabling Team
	Number Received	Summary of Responses from Individuals (Policy HOU2)	

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Summary of Objections	10	<p>Objections comment on the shortage of affordable housing in the District and the need to build more in the new plan. A number of comments focused around the need for houses for first time buyers some preferring an increase in low cost home ownership models, rather than housing associations while other supported more rented properties. The requirement for affordable housing percentage was supported but some challenged that it was too low. Others suggested that the zonal approach was not supported by the Council's viability study and lower percentage should be required in the identified zones away from the coast. Affordable housing thresholds were also challenged in that a higher threshold in line with national policy should be applied outside the AONB. More housing with care is needed to enable the ageing population to continue living independently with the support they need. Specific issues raised about Wells-next-the-Sea, although the overall number of homes was not challenged it was thought the application 35% affordable housing would not address local need. No need for large houses and housing should be available to people who live or work in the District. The Affordable Housing Zones 1 and 2 as identified in the Draft LP (page 122) are inconsistent with the Zones shown in the NNDC Interim Plan Wide Viability Assessment(2018). One representations comments that the approach doesn't comply with the NPPF Para 63 and should be amended to only require contributions to or provision of affordable housing on schemes of 6 or more dwellings for sites in the AONB, outside the AONB, the threshold should be 10 or more units, following the definition of major development set out in the NPPF glossary.</p>
Summary of Support	1	<p>Although there was limited direct support there was indirect support contained in comments for the policy approach in that it recognises the need to address affordable housing, ensure appropriate type and size of homes are sought and that the proposed policy recognises the need for elderly accommodation.</p>
Summary of General Comments	14	<p>General comments mainly focused on the preference for more affordable housing at a price and tenure that suits local need and for homes for the elderly and people with dementia that could be adaptable. Some support for self build but not tied to the settlement hierarchy. mixed opinions were given on tenure, with some favouring low cost home ownership products to get onto the housing mkt while others thought more rented / social prices should be delivered. Generally considered that the provision for Low Cost Home Ownership must reflect actual levels of income within North Norfolk rather than levels of average income for England as a whole. Others commented that the policy was too restrictive and prescriptive and not flexible enough to respond to the changing needs over the plan period</p>
Overall Summary		<p>Most comments raised concern about the shortage of affordable housing within the District and the need to encourage more, at a price and tenure that addresses local need with the provision for Low Cost Home Ownership reflecting actual levels of income within North Norfolk rather than levels of average income for England as a whole. Generally there is support for a higher affordable percentage being required. Concerns around the perceived impacts of second homes on the price of homes was a common theme. Support was also implied for more elderly accommodation and adaptable homes however there were others that said the approach was too restrictive and not reflective enough to local circumstances and challenged the evidence base on viability zones and the lowering of the affordability threshold outside the AONB.</p>

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Council's Response		Noted: agree, disagree (partly) - Consider comments in the development the policy. Affordable housing need is identified in the Strategic Housing Market Assessment and evidence shows a clear need for rented properties and two /three bedroomed properties which the policy advocates . The Council consider that affordable homes should be genuinely affordable reflecting the local economy and support for price controls in accordance with local income is however also welcomed. The policy is designed to deliver the identified strategic needs of the District while Other policies in the plan actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts brought about through community planning powers. Policies HOU8 & 9 focus on the requirement for minimum space standards and accessible and adaptable properties. The Council supports self building in accordance to sustainable distribution principle. The viability zones reflect the conclusions of the Plan wide viability study and market values/development costs across the district and the approach across the distribution and allocations meets the identified need for affordable housing . Affordable Housing thresholds reflect the rural area designation of north Norfolk under the s.157 Housing Act 1985.
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