

## Appendix 1 - Schedule of Representations

Extract of Report of Representations

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

### Policy ECN4 Regulation 18 Reponses.

#### Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN4	Walker, Mrs Kerry (1217345)	LP331, LP350	Object	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY</b> ~Questions the approach to retail provision and growth in the Local Plan.</p> <p>~why does the draft Local plan only plan 10 years in advance and has not taken the evidence from the 2017 Retail Study to allocate floor space for the whole 20-year period up to 2036</p> <p>~the proposed approach will cause further leakage to Norwich or other centres.</p> <p>~the suggested approach of providing opportunities for future development on surface car parks around the centre will impact on car parking capacity and may increase leakage</p> <p>~the proposed approach will not address the dominance of Roys. Seeks the removal of planning powers of the BA in respect to Hoveton's retail growth. The increase in floor space for convenience food over the 20 year plan period. The creation of a policy to protects A1-A5 independent shops in the extended primary shopping area as set out in and recommended by the evidence in NNDC's 'North Norfolk Retail and Main Town Centre Uses 2017 Study' Incentives for existing and new independent retailers outlets to uptake the allocated growth in retail floor space for Hoveton.</p> <p>~raised concerns over the BA role in retail and suggested there are complexities as a result of the dual authorities</p>
ECN4	Broadhead, Ms Beverley (1217202)	LP289	Object	<p><b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> NNDC need to radically rethink what 'community' looks like. The traditional high street both at village and town level are changing. Digital technologies and vital services need to be embedded in the centre of town alongside places where people can work and live. Many shops have undeveloped, potential living and work spaces above them and the council should be working with landlords to develop these 'slack' spaces, where existing infrastructure is in place, rather than looking to build on valuable green field spaces. The high street is changing, but having people living and working in centres will increase footfall, increase out of hour's business potential and small, independent retail outlets will then begin to find a market. Reducing the need for car travel will make places more attractive, create less pollution, and increase overall health and wellbeing.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN4	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Existing sites within the town (e.g. brownfield, empty commercial properties) must surely be considered as a priority before new builds, to reduce environmental impact and make the most of developmental opportunities we already have, whilst also improving and reinvigorating the town centre.
ECN4	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Food and eating habits are another source of carbon costs. Again, NNDC is not in control, but , working with others like the Tourist Board, it can help to educate people into the benefits of more vegetarian diets and promote this is all its institutions and among local restaurants and hotels. It can also promote simple cooking as opposed to highly processed foods. It can support allotments, and local farm sales. No more supermarkets should be given planning permission. They have heavy carbon costs. The treatment of waste is another area it could influence.
ECN4	Johnson, Mr & Mrs (1215700)	LP143	Support	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Agree. The sustainability of local centres of facilities such as shops and businesses depends upon those businesses having trade. Excessive parking charges and lack of parking for users and operators discourages use of such businesses. This should be borne in mind when setting rates.
ENC4	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Support a policy which privileges a town centre first approach and we would question the advantage of further large scale retail development at a distance from our primary shopping area. North Walsham is a historic market town. It is important to us that our town centre be protected both in terms of its independent retail offer and its historic fabric. We welcome the statement that development that under the draft plan proposals would be supported “provided that development respects the character of the centre, including its special architectural and historic interest, and assists in maintaining its retail function.” North Walsham’s market lies at the heart of our conservation area and the market contains many listed buildings. The conservation of these buildings is vital to the appeal of our town. We are minded to favour the locally derived impact threshold for North Walsham and we too would be inclined to permit residential use above the ground floor level. We believe that it is always preferable that historic buildings be occupied rather than left empty. We would like to see this policy upheld and implemented.

Individuals	Number Received	Summary of Responses (Policy ECN4)
Summary of Objections	3	Objections focused on the perception of changing highstreets, Digital technologies need to be embedded in the town centre alongside places where people can work and live utilising spaces above shops and the need to put town centres first. The overall quantum of need was questioned in relation to the evidence study asking why the plan only looks 10 years in advance in relation to floor space requirements. The proposed approach will cause further leakage to Norwich or other centres. Developing car parks will impact on car parking capacity. The

		proposed approach for Hoveton will not address the dominance of Roys. The roll of the Broads Authority (BA) was also questioned and suggested there are complexities as a result of the dual authorities.
<b>Summary of Supports</b>	1	Support for the policy recognised that town centres remain the focus for retail commenting that no land use planning matters such as the impact of high car parking fees should be taken into consideration when setting rates
<b>Summary of General Comments</b>	2	General comment supported the a policy which "privileges" a town centre first approach and questioned the advantage of further large scale retail development at a distance from the primary shopping area - with particular reference to North Walsham's . Brownfield land in town order should be prioritised to reduce environmental impact, improving the town centre.
<b>Overall Summary</b>		No substantial issues raised. Comments acknowledged that the high street is changing, and suggests that digital technologies should be embedded in town centres, alongside places where people can work and live, potentially above shops. Support a town centre first approach. Questions why the plan only plans 10 years in advance and does not use the 2017 Retail study to allocate floor space for the plan period. Should prioritise brownfield central locations to reduce environmental impact and improve town centres, also reducing the need for cars. Policy and building on car parks will lead to people traveling to other centres. Excessive parking charges and lack of parking for users and operators discourages use of such businesses.
<b>Council's Response</b>		Noted Consider adding the retail projection 2026 - 36 in the final document. The issue of retail capacity is considered by the 2017 NNDC Retail and Town centre study Town centre. Retail evidence found a limited scope for additional convenience and comparison goods floorspace across the district over and above planned commitments but growth would help to address leakage in comparisons goods where investment would help claw back investment and increase footfall. The policy seeks a town centre first approach utilises the sequential approach in order to enhance local provision and utilise appropriate retail growth to contribute to the public realm and visual amenity of surroundings in order to enhance town centres. The policy adopts a whole town approach across Hoveton as the BA is the relevant planning authority for part of the town centre.

## Parish and Town Councils

<b>Draft Policy</b>	<b>Name &amp; Comment ID</b>	<b>Ref</b>	<b>Nature of Response</b>	<b>Summary of Comments (Parish &amp; Town Councils)</b>	<b>Council's Response</b>
ECN4	Cromer Town Council (1218420)	LP732	General Comments	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Concern that some shops are not within the commercial area. ALL shops need to be included within the primary shopping area. This includes the East End of Cromer from Church Street to the junction with Overstrand Road, the western end of Overstrand Road, Bond Street, Louden Road and Mount Street. Public Art • Public art should be positively encouraged more than it is in the draft. We should be working towards securing contributions towards public art from developments, and the provision of public art on new open space	Consider comments in the development the policy approach. The primary shopping area is a defined area where retail development is concentrated, the Town centre boundary is defined as the PSA and areas that

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					predominantly occupied by "main town centre" uses within or adjacent to the PSA. Consider revising PSA to include east of Church Street towards Overstrand Road
ECN4	Sheringham Town Council (1217426)	LP548	General Comments	STC notes that S. 10.35 proposes Sheringham is a smaller town centre to complement the larger town centres in the district. However, STC considers it imperative that Sheringham continues to offer year-round retail facilities with a wide range of outlets. The Table shows the Projected new retail floor space requirement 2016-2026 for Sheringham with 588sqm for Convenience Goods, 457sqm for Comparison Goods and 268sqm for Food and Beverage. STC is keen to limit the development of food and beverage floor space in favour of other retail use and therefore would like to see these projections adhered to through the planning process. The designated Town Centre boundary includes the north end of High Street which contains a number of retail and leisure outlets. However, the designated Primary Shopping Area does not include this area. STC would like the red line of the Primary Shopping Area extended northwards to include both sides of High Street.	Noted. Proposals for retail development at an appropriate scale will be supported provided that they reflect the identified capacity to support growth established through the most up to date evidence and in line with impact thresholds put forward through policy ECN4. • Consider comments in the development the policy approach, the primary shopping area is a defined area where retail development is concentrated, the Town centre boundary is defined as the PSA and areas that predominantly occupied by "main

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					town centre" uses within or adjacent to the PSA. Consider revising PSA to include the northern end of the highstreet.
ECN4	North Walsham (1218408)	LP730	Object	The Town Council recognises that the Town Centre is very fragile, and initiatives are in progress to improve this situation. The Town Council also believes that the primary shopping area needs to be protected from residential conversions and other losses, such that it has capacity to serve the likely future specialist shops, social and entertainment needs of the expanded town that are implied in the Local Plan. The Town Council suggest this protection should also include the retail units in Mundesley Road, Vicarage Street and Kings Arms Street, as highlighted in green in the plan attached.	Consider inclusion of retail units and main town centre uses as suggested in the finalisation of the PSA and TC boundary and policy ECN4 - . The primary shopping area is a defined area where retail development is concentrated, the Town centre boundary is defined as the PSA and areas that predominantly occupied by "main town centre" uses.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN4)
<b>Objection</b>	1	The town council would like further consideration of an extension to the primary shopping area to the north end of the High Street in Sheringham. In North Walsham the town council would like the PSA extended to include retail units in Mundesley Road, Vicarage Street and Kings Arms Street. In Cromer it was also suggested that the PSA should be expanded to cover all streets where there are retail shops. Contributions for public art where supported by one respondent.
<b>Support</b>	0	
<b>General Comments</b>	2	

## Organisations and Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN4	Broads Authority (321326)	LP806	General Comments	10.25 – suggest you say 'Hoveton Town Centre spans Local Authority boundaries and part falls under the Broads Authority Administrative Area'. • 10.46 – needs to mention the Broads. •	Consider clarification in future iteration of the Plan
ECN4	Norfolk County Council (931093)	LP739	Support	The County Council supports the enabling economic growth aim and objective contained within the emerging Local Plan and the need to provide sustainable economic development. 4.2. The Local Plan acknowledges that economic activity rates are lower in the district than the national average and the County Council welcomes the vision of providing accessible better paid local jobs and the aspiration set out in section 10 to broaden the economy to offer a wider choice of employment opportunities and achieve a more balanced economy and population in the future. 4.3. Policy ECN 4 – The County Council supports the inclusion of a Policy for town centres and the objectives of the policy .This policy can work successfully alongside the County Councils Network Improvement Strategies (currently being produced for North Walsham and Fakenham) focussing on transport issues including town centre improvements for all modes of transport. This continues with a town centre first approach in line with the National Planning Policy Framework (2019) (NPPF), for retail, leisure and cultural uses.	Support noted
ECN4	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP757	General Comments	Bullet point 4 of the policy refers to the capacity available to support the proposal and how it seeks to enhance expenditure retention. These are inconsistent with national policy which does not require consideration of need for the proposals. The policy should be amended to make it clear that proposals outside of the designated centres will be subject of an impact assessment and sequential test (taking account of the market and locational requirements of the operator). If these are satisfied permission will be granted	Disagree. The policy is clear that proposals should follow national policies. Support for out of town development is dependent on how it reflects the capacity to support such a proposal i.e. the impact. Impact Thresholds are included in the table within the policy. ADD Impact Threshold

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					header to table in the policy.
ECN4	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP630	Support	<b>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> The policy appropriately aims to maintain and enhance the vitality and viability of town centres, particularly given their significance as service centres to support the wider area. However, in growth areas, such as at Fakenham, supporting retail development should be commensurate to the scale and form of development taking place. In this regard, the largest growth proposed at Fakenham lies to the north of the settlement and the scale of development proposed has the potential to support some additional out-of-centre local retail provision. Trinity College supports a policy approach that enables out-of-centre retail provision in conjunction with other development, but proposes that the threshold for Fakenham should provide greater flexibility in order to support the significant growth proposed to the north of the town.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN4)
Objection	0	The approach was largely endorsed by those that responded with only minor amendments put forward for consideration.
Support	2	
General Comments	2	

### Responses on Alternatives

ECN4	Mr & Mrs Johnson (1215700)	AC044	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> The sustainability of local centres of facilities such as shops and businesses depends upon those businesses having trade. Excessive parking charges and lack of parking for users and operators discourages use of such businesses. This should be borne in mind when setting rates.	Comments noted: This comment repeats the support ECN4 made against the First Draft Local Plan (Part 1).
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## Policy ECN5 Regulation 18 Responses.

### Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN5	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	<b>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</b> Well-designed signage and shopfronts are another important element in the appeal of our town’s retail offer. As we have stated above, North Walsham’s market lies within a conservation area. Signage has been neglected over the years. It is our position that advertisements and shopfronts should follow the guidance contained within the North Norfolk Design Guide SPD rather than simply having regard to the Guide. We would hope to see a more strongly worded policy than the one proposed here.

Individuals	Number Received	Summary of Responses (Policy ECN5)
Summary of Objections	0	No comments received
Summary of Supports	0	No comments received
Summary of General Comments	1	Well-designed signage and shopfronts are another important element in the appeal of our town’s retail offer. Advertisements and shopfronts should follow the guidance contained within the North Norfolk Design Guide SPD rather than simply having regard to the Guide.
Overall Summary		Limited comments were received on this policy. Well-designed signage and shopfronts are important to the retail offer in towns and should follow the guidance contained in the Design Guide rather than having regard to the guide.
Council's Response		Noted: Consider clarification in future iteration of the Plan

### Parish and Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN5	N/A	N/A	N/A	No comments received.	N/A

### Organisations and Statutory Consultees



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP522	Support	Policy ECN5 –Consider impact lighting has on visual amenity.	Comments noted. Consider comment in the finalisation of the Policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN5)
Objection	0	Limited response received to this policy - Support for the policy by the Norfolk Coast Partnership.
Support	1	
General Comments	0	

### Alternatives

No comments received