

Policy ECN6 - New-Build Tourist Accommodation, Static Caravans & Holiday Lodges

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN6	Broads Authority (321326)	LP806	General Comments	When you say 'static caravans' do you mean those used for holiday use or for permanent residential use? You might want to state which	Noted: consider clarification in the finalisation of this policy
ECN6	Environment Agency (1217223)	LP475	General Comments	The policy states that new accommodation will be supported where "the proposal is for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3". Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' so are not permitted in Flood Zone 3, and require the exception test in Flood Zone 2, this is because they are very difficult to make safe through raised flood levels. For any caravan site used for short-let or holiday use there should be a reference to the need for any site proposal to provide confirmation that there are adequate warning and evacuation arrangements. If caravan sites in coastal areas are likely to become unsustainable due to increasing flood risk over time, then it would be useful for local plan policies to be open to adaptive measures such as relocation to areas at lesser risk of flooding.	Noted: Consider comments in the development the policy.
ECN6	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP558	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the emerging Local Plan Review for North Norfolk. As a major landowner in the District would wish to continue to engage with Officers and Members about the progress of the emerging Local Plan.. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies: • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the emerging Local Plan Review for North Norfolk. As a major landowner in the District would wish to continue to engage with Officers and Members about the progress of the emerging Local Plan. It is stated at paragraph 10.63 that "The Council recognises the importance of maintaining vibrant and active local communities during off-peak tourism months and of striking a balance between	Noted Consider comments in the finalisation of the policies

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				<p>providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration for the emerging North Norfolk District Council Local Plan. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies: • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Support is given to Policy ECN 7 which provides additional flexibility for the provision of caravans and camp sites beyond settlement boundaries, where the site does not lie within the AONB, to reflect the seasonal nature of this tourist accommodation. Some support is given to the flexibility of the criteria at Policy ECN 6 and ECN 7 for expansion of existing tourist accommodation. Whilst recognised that there is a need to conserve and enhance the AONB it is requested that additional flexibility is incorporated to draft Policy ECN7 to allow for appropriate high quality new tourist development which complies with other relevant Local Plan policies, including Policy ENV 2 ‘Protection & Enhancement of Landscape & Settlement Character’ and Policy ENV 4 ‘Biodiversity and Geology’ to come forward within the AONB, particularly if the accommodation is seasonal in nature. Footnote 93, referenced at Policy ECN7, defines ‘touring caravan and camping sites’ as sites for touring caravan and camping sites, glamping, yurts, tepees and shepherd’s huts. We welcome this definition for clarity. On a more general basis, in respect of sites situated beyond the settlement boundary, it is requested that the Council considers the potential for well-planned tourist accommodation to be located sites along main transport routes and in proximity to public transport links. Again it will be necessary for these sites to comply with other relevant Local Plan policies, including Policy ENV 2 ‘Protection & Enhancement of Landscape & Settlement Character’ and Policy ENV 4 ‘Biodiversity and Geology’. In the interest of farm diversification, we would welcome specific reference within policy to the reuse of appropriate scale agricultural buildings for tourist accommodation where proposals comply with other relevant Local Plan policies. Retaining an Adequate Supply and Mix of Tourist Accommodation In addition the Council is proposing a Policy ECN 9 to seek to retain an adequate supply and mix of</p>	

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				tourist accommodation. The Council acknowledges at paragraphs 10.62 of the Draft Local Plan "...that tourist accommodation is sometimes under pressure for conversion, often to residential, particularly in locations where new residential properties are more strictly controlled." The Council should commission evidence base documents which specifically considers the implications of tourism pressures upon existing housing stock and to ensure that sufficient housing planned for to meet the needs of local people.	
ECN6	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP524, 525	Support	Policy ECN6 – (New-Build Tourist Accommodation, Static Caravans & Holiday Lodges), other types of tourist accommodation mentioned the AONB. We would like to see the AONB protected similarly in this policy.	Comments noted. Consider comment in the finalisation of the Policy.
ECN6	Blakeney Hotel (Mr John Long, John Long Planning Ltd) (1216065 & 1216646)	LP227	Object	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Blakeney Hotel has concerns regarding Policy ECN 6 and its potential impact on the Hotel's prospective proposals to expand and provide more tourist accommodation at the Hotel. The Policy specifically requires Hotel development to demonstrate compliance with the sequential approach in accordance with national and local retail policies. It is not clear whether this part of the policy is applicable to just 'new' hotels; or 'all' hotel development including existing hotel business expansion proposals. If it applies to 'all' hotel development including existing hotel expansion it would effectively restrict the Hotel's (and many other hotels not in town centre locations) ability to grow and expand to meet visitor needs. The Policy should be changed to confirm that the sequential test will not apply to existing hotel expansion proposals.	Noted: Proposals for new build and extensions to existing tourism buildings are also covered in ECN8 - Proposals are encouraged within settlements boundary of selected growth settlements first before seeking growth in the countryside.
ECN6	Caravan and Motorhome Club (1218484)	LP790	Support	This representation relates specifically to Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges and Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites. The Caravan and Motorhome Club has two well performing sites in North Norfolk District; the first is Seacroft Caravan and Motorhome Club Site (location plan enclosed); the second is Inleboro Fields Caravan and Motorhome Club Site (location plan enclosed). A brief site and surrounding description is outlined below. Site and Surroundings Seacroft Caravan and Motorhome Club Site is located to the west of the town of Cromer. The site is accessed off Cromer Road to the north, which provides access to the main town of Cromer to the east and West Ruston and Sheringham to the west. The site, circa 3.7hectares (9 acres), provides a total of 135 grass, all-weather and tent pitches. The site also includes internal tarmac roads, a reception/information room, toilets & shower block, a laundry room and a leisure complex comprising bar, restaurant, games room and heated outdoor swimming pool. The site is not only well set back from the road to the north, but it is also well screened by mature trees and hedgerows around the boundary of the site. The site is bound by the train lines to the south and development to the east and west. The area of land just to the east is allocated for mixed use development within the emerging local plan. The	Support noted - consider the proposed alterations to the text and potentially the addition of 'pods' within footnote 90 to ensure these are included within the definition of the policy.

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				<p>site is located within a short walk (15 minutes) from Cromer centre, which provides a wide range of services including restaurants, supermarkets, post office, banks and pubs. Furthermore, regular bus services (every 15 min) provide transport to Cromer (5 minutes) and from there train travel is possible to surrounding larger cities such as Norwich (45min). In respect of this site, the Caravan and Motorhome Club would like to extend its Seacroft Caravan and Motorhome Club Site located at Cromer Road, East Runton, Cromer, NR27 9NH – please find enclosed an indicative site plan for reference. This extension could include additional touring pitches, lodges and camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Caravan and Motorhome Club can continue to meet the changing needs of its members. On this basis, the below policy changes discussed in the ‘Emerging Local Plan’ are sought. Inleboro Fields Caravan and Motorhome Club site is located to west of the Seacroft site, closer to the settlement of West Runton. The site is located within the Links County Park golf course and is accessed from Station Close to the north. The site extends to circa 8.5 hectares (21 acres) and provides a total of 261 primarily grass touring pitches for caravans and motorhomes. The site also includes an information/reception room, shower room, dishwashing area and toilet block. The site itself is well screened on all sides by dense vegetation and has an internal tarmacked circulation road which provides access to the touring pitches. The site is located just a short walk from West Ruston which provides services and facilities for visitors. The nearby towns of Sheringham and Cromer provide a greater range of facilities and services and both can be accessed in less than 20 minutes via a local bus service. In respect of this site, the Caravan and Motorhome Club would like to diversify their offer to provide pods and lodges. The site is well screened and therefore, static pods and lodges will have a limited impact on the surrounding landscape and ecology. There are existing touring pitches and therefore, the diversification to lodges will not impact on the surrounding landscape. On this basis, the below policy changes discussed in ‘Emerging Local Plan’ are sought. Policy ECN 6 is written in respect of existing static caravans and lodges. This policy should also take into account existing touring caravan sites which could diversify and improve their offer, to provide pods and lodges. While it is noted that static lodges can impact on the surrounding landscape, if this is considered appropriately within a submission, in principle the diversification should be supported. As such, the following sentence should be included within Policy ECN 6 or 7: The diversification of touring caravan pitches to static lodges or pods will be supported where:</p> <ul style="list-style-type: none"> • the proposals are for the expansion of an existing business; • there are no significantly detrimental impacts on the area’s landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network; and • the 	

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				<p>site lies outside the Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3 Overall, and considering the above, policies must be sufficiently flexible to allow businesses to adapt to changing economic trends and changes in the demands of tourists. As such, policy will enable the Caravan and Motorhome Club to support the growth of the local economy by ensuring the ability of its existing sites to be developed and enhanced. Overall, this ensures the future viability of the business, and supports the tourist industry within North Norfolk.</p>	
ECN6	Concept Town Planning (1217445)	LP544	Object	<p>Paragraph's 10.44 - 10.50 outline the LPA's support for tourist accommodation. In particular, paragraph 10.49 states that new tourist accommodation will be permitted in areas that can accommodate additional visitor numbers without detriment to the environment. However, Policy ECN6 then restricts this to within the settlement boundary of a selected settlement, if it is for a standalone development. The policy is, therefore, at odds with the supporting text as well as with the NPPF, which supports sustainable rural tourism that benefits the rural economy whilst respecting the character of the countryside. By only allowing tourist accommodation within a settlement boundary, it limits the type of accommodation that can be provided, as well as the experience of visitors to the area as they would only be staying within a built up environment. The fact that a number of proposed new housing allocations in settlements are necessitating extensions to settlement boundaries is further testament to the fact that there is already limited scope for a range of tourist accommodation in these areas. Amend Policy ECN6 to read, "New-build tourist accommodation, static caravans and holiday lodges will be supported where: 1. The site lies within the settlement boundary of a selected settlement or is well related to it."</p>	Noted- consider the wording of criterion 1 and the extent to which this is in conformity with the NPPF
ECN6	Timewell Properties (John Long Planning Ltd.) (1216647 (1216065))	LP359	Support	<p>Blue Sky Leisure can support elements of the policy particularly point 3, the support for proposals where they are for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone. However, Blue Sky Leisure is concerned that other elements of this policy will apply to proposals for the relocation /replacement of tourist accommodation outside of the Coastal Change Management Area, (as well as the expansion of existing businesses); that represent further restrictions and burdens additional to those included in Policies SD 11 and SD 12, which incidentally, are also considered to stifle tourism accommodation development, and the application of the 'roll back' approach. As drafted, point 4 of the Policy requires proposals for the 'relocation/replacement' of tourist accommodation schemes to "....demonstrate a net benefit in terms of landscape and ecology." This is a further barrier to tourism development and goes beyond the existing Development Plan policy which requires proposals to demonstrate a minimal adverse impact on surroundings and not a net benefit. Proposed change: Blue Sky Leisure suggests that point 4 of the policy is removed, as it repeats provisions in Policy SD12.</p>	Noted - consider the removal of criterion 4 as this is set out within Policy SD 12

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN6)
Objection	2	Broad support for the proposed policy wording. Representations raised the need to clarify definitions within the policy. One respondent set out that the policy is too restrictive and should be made more flexible.
Support	4	
General Comments	2	

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Policy ECN7 - Use of Land for Touring Caravan & Camping Sites

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN7	Environment Agency (1217223)	LP476	General Comments	Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' so are not permitted in Flood Zone 3. We are pleased to see reference to this within the policy. It should be noted that the exception test is required in Flood Zone 2. These can be difficult to make safe through raised flood levels. Appropriate measures should be in place to ensure occupation does not become permanent.	Noted
ECN7	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP558	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Savills (UK) Ltd is instructed by The Holkham Estate to make the necessary and relevant representations to the emerging Local Plan Review for North Norfolk. As a major landowner in the District would wish to continue to engage with Officers and Members about the progress of the emerging Local Plan. It is stated at paragraph 10.63 that “The Council recognises the importance of maintaining vibrant and active local communities during off-peak tourism months and of striking a balance between providing permanent housing for local people and providing tourist accommodation to support the local community.” It is considered that this is a key consideration for the emerging North Norfolk District Council Local Plan. It is recommended that the Council commissions a detailed assessment of Tourist Accommodation and the interrelationship with residential properties. The National Planning Policy Framework (NPPF) recognises at paragraph 83 that planning policies should seek to sustainable rural tourism and leisure developments which respect the character of the countryside. In addition paragraph 172 of the NPPF advises that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty. It states that the scale and extent of development within these designated areas should be limited. Within this context the Council has proposed the following tourism policies: • Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges • Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites These policies primarily seek to direct permanent tourist accommodation development within settlement boundaries and away from the AONB to limit landscape impact of tourist accommodation. This approach has the potential to further intensify the tourism pressures within existing settlements. Support is given to Policy ECN 7 which provides additional flexibility for the provision of caravans and camp sites beyond settlement boundaries, where the site does not lie within the AONB, to reflect the seasonal nature of this tourist accommodation. Some support is given to the flexibility of the criteria at Policy ECN 6 and ECN 7 for expansion of existing tourist accommodation. Whilst recognised that</p>	Comments noted

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				<p>there is a need to conserve and enhance the AONB it is requested that additional flexibility is incorporated to draft Policy ECN7 to allow for appropriate high quality new tourist development which complies with other relevant Local Plan policies, including Policy ENV 2 'Protection & Enhancement of Landscape & Settlement Character' and Policy ENV 4 'Biodiversity and Geology' to come forward within the AONB, particularly if the accommodation is seasonal in nature. Footnote 93, referenced at Policy ECN7, defines 'touring caravan and camping sites' as sites for touring caravan and camping sites, glamping, yurts, tepees and shepherd's huts. We welcome this definition for clarity. On a more general basis, in respect of sites situated beyond the settlement boundary, it is requested that the Council considers the potential for well-planned tourist accommodation to be located sites along main transport routes and in proximity to public transport links. Again it will be necessary for these sites to comply with other relevant Local Plan policies, including Policy ENV 2 'Protection & Enhancement of Landscape & Settlement Character' and Policy ENV 4 'Biodiversity and Geology'. In the interest of farm diversification, we would welcome specific reference within policy to the reuse of appropriate scale agricultural buildings for tourist accommodation where proposals comply with other relevant Local Plan policies. Retaining an Adequate Supply and Mix of Tourist Accommodation In addition the Council is proposing a Policy ECN 9 to seek to retain an adequate supply and mix of tourist accommodation. The Council acknowledges at paragraphs 10.62 of the Draft Local Plan "...that tourist accommodation is sometimes under pressure for conversion, often to residential, particularly in locations where new residential properties are more strictly controlled." The Council should commission evidence base documents which specifically considers the implications of tourism pressures upon existing housing stock and to ensure that sufficient housing planned for to meet the needs of local people.</p>	
ECN7	<p>Norfolk Coast Partnership, Ms Gemma Clark</p> <p>(1217409)</p>	LP526	Support	Support	Support welcomed
ECN7	<p>Caravan and Motorhome Club</p> <p>(1218484)</p>	LP790	Support	<p>This representation relates specifically to Policy ECN 6 – New-Build Tourist Accommodation, Static Caravans and Holiday Lodges and Policy ECN 7 – Use of Land for Touring Caravan and Camping Sites. The Caravan and Motorhome Club has two well performing sites in North Norfolk District; the first is Seacroft Caravan and Motorhome Club Site (location plan enclosed); the second is Inleboro Fields Caravan and Motorhome Club Site (location plan enclosed). A brief site and surrounding description is outlined below. Site and Surroundings Seacroft Caravan and Motorhome Club Site is located to the west of the town of Cromer. The site is accessed off Cromer Road to the north, which provides access to the main town of Cromer to the east and West Ruston</p>	<p>Support noted - consider the proposed alterations to the text and potentially the addition of 'pods' within footnote 90 to ensure these are included within the definition of the policy.</p>

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				<p>and Sheringham to the west. The site, circa 3.7hectares (9 acres), provides a total of 135 grass, all-weather and tent pitches. The site also includes internal tarmac roads, a reception/information room, toilets & shower block, a laundry room and a leisure complex comprising bar, restaurant, games room and heated outdoor swimming pool. The site is not only well set back from the road to the north, but it is also well screened by mature trees and hedgerows around the boundary of the site. The site is bound by the train lines to the south and development to the east and west. The area of land just to the east is allocated for mixed use development within the emerging local plan. The site is located within a short walk (15 minutes) from Cromer centre, which provides a wide range of services including restaurants, supermarkets, post office, banks and pubs. Furthermore, regular bus services (every 15 min) provide transport to Cromer (5 minutes) and from there train travel is possible to surrounding larger cities such as Norwich (45min). In respect of this site, the Caravan and Motorhome Club would like to extend its Seacroft Caravan and Motorhome Club Site located at Cromer Road, East Runton, Cromer, NR27 9NH – please find enclosed an indicative site plan for reference. This extension could include additional touring pitches, lodges and camping pods. These are generally small scale, permanent or semi-permanent structures of varying sizes, typically containing a bedroom as well as some cooking facilities and/or bathroom facilities depending on their size. The provision of this type of accommodation ensures that the Caravan and Motorhome Club can continue to meet the changing needs of its members. On this basis, the below policy changes discussed in the ‘Emerging Local Plan’ are sought. Incleboro Fields Caravan and Motorhome Club site is located to west of the Seacroft site, closer to the settlement of West Runton. The site is located within the Links County Park golf course and is accessed from Station Close to the north. The site extends to circa 8.5 hectares (21 acres) and provides a total of 261 primarily grass touring pitches for caravans and motorhomes. The site also includes an information/reception room, shower room, dishwashing area and toilet block. The site itself is well screened on all sides by dense vegetation and has an internal tarmacked circulation road which provides access to the touring pitches. The site is located just a short walk from West Ruston which provides services and facilities for visitors. The nearby towns of Sheringham and Cromer provide a greater range of facilities and services and both can be accessed in less than 20 minutes via a local bus service. In respect of this site, the Caravan and Motorhome Club would like to diversify their offer to provide pods and lodges. The site is well screened and therefore, static pods and lodges will have a limited impact on the surrounding landscape and ecology. There are existing touring pitches and therefore, the diversification to lodges will not impact on the surrounding landscape. On this basis, the below policy changes discussed in ‘Emerging Local Plan’ are sought. Emerging Local Plan The Caravan and Motorhome Club supports the overarching approach that is being taken through Policy ENC 7 – which reads as follows: The use of land for touring caravan and camping sites will be supported</p>	

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				<p>where: 1. the site lies within the settlement boundary of a selected settlement; or 2. the proposal is for the expansion of an existing business; or 3. the site lies outside of the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3;(94) 4. in all cases there is no significantly detrimental impacts on the area's landscape, ecology, amenity of neighbouring land uses, and the character of the area by virtue of increased noise and impacts on light or highway safety and the operation of the highway network. Taking the above points in order, the Caravan and Motorhome Club has no comment in respect of point 1, as it is seeking changes in policy to take into account existing sites more proactively. In terms of point 2, the Caravan and Motorhome Club supports the inclusions which allows for existing businesses to expand to take into account additional growth. In terms of point 3, the Caravan and Motorhome Club largely supports the approach being taken here, however, sites should be considered on a site by site basis. Where landscaping and surrounding vegetation surround sites within the AONB, policy should allow their expansion. The impact of increased caravans on the surrounding landscape will be limited due to the surrounding vegetation. In terms of point 4, the Caravan and Motorhome Club largely supports the approach being adopted here. However, this approach should be replicated for sites within the AONB. If there is no significant impact upon the landscape, ecology and amenity, then development proposals which seek to improve the offer, and thus the local economy, should be supported.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN7)
Objection	0	General support expressed with only minor suggestions raised in regard to the wording of the policy.
Support	3	
General Comments	1	

Policy ECN8 - New Build & Extensions to Tourist Attractions

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN8	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP758	General Comments	New-Build & Extensions to Tourist Attractions Part 1 under Countryside Policy Area should be omitted. There is no need to impose a blanket restriction on development in the AONB, Heritage Coast or Undeveloped Coast parts of the District. The blanket restriction imposed by part 1 is contrary to the NPPF, which expresses support for policies and decisions which enable sustainable rural tourism and leisure developments which respect the character of the countryside.1 In this regard and given the importance of tourism and leisure to the local economy parts 2 and 3 under Countryside Policy Area should be worded much more positively and replaced by the following wording: The scale and design of any new developments are sensitive to the character and setting of the local area	Noted consider comments in the finalisation of this policy
ECN8	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP527	Support	Support	Support welcomed

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN8)
Objection	0	Limited comments received, no substantive issues raised. The approach was broadly supported, however one respondent thought the approach was unduly restrictive in regard to the AONB, Heritage Coast or Undeveloped Coast.
Support	1	
General Comments	1	

Policy ECN9 - Retaining an Adequate Supply & Mix of Tourist Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ECN9	Wells Neighbourhood Plan, Questionnaire. (Mr Peter Rainsford) (1216818)	LP446	Object	In respect of 19.3 responding to the question (clarification added - in the wells NP survey)"do you think that tourism should in any way be restricted in and around Wells by controls over development?" 235 responded "yes"(77.8%) and 52 "no" (17.2%). Major reasons given for attempting to limit tourism were: lack of adequate parking (79 first preference, 83 second preference and 39 third preference), damage to natural environment (69 first preference, 40 second preference and 46 third preference), traffic congestion (64 first preference, 87 second preference and 58 third preference). It should be noted that instead of limiting tourism, some respondents preferred managing it, please see full survey attached	Comments noted. The Local Plan is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. Wells is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers to bring forward local solutions to land use planning issues where they are justified by appropriate evidence.
ECN9	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746,LP759	General Comments	To make it clearer that parts 1 and 2 are alternatives to be satisfied rather than both must be satisfied, 'or' should be inserted at the end of criteria	Noted consider comments in the finalisation of this policy
ECN9	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP760	General Comments	As indicated in the Kelling Masterplan, Kelling Estate own and operate the Pheasant Hotel which is the only 4* hotel in the locality with the space to improve and expand its range of facilities and accommodation. It is proposed that the hotel be expanded to provide: • Additional bedrooms; • Conference facilities; • Spa/Pool facilities; • Self-catering lodge accommodation; • Staff accommodation; • Additional car parking The provision of first-class conference and spa facilities will provide an important attraction in North Norfolk which it currently lacks and will improve the year around attractiveness of the venue to business customers and for short stay breaks. As outlined in the Kelling Masterplan a policy for the Pheasant Hotel site should be included in the Local Plan which expresses support for the expansion plans, as outlined below. This will provide a greater degree of certainty for the site owner to bring forward this significant positive new investment in accommodation facilities for North Norfolk with confidence. Policy XXX – Land at the Pheasant Hotel, Kelling Development	Noted consider commentary in the finalisation of the approach to countryside development through large estate management. See also commentary on SD4

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				<p>proposals for the expansion of holiday accommodation, and related ancillary accommodation at the site, as outlined in the masterplan below, will be supported in principle, subject to complying with other relevant policies of the Local Plan. . As outlined in the Kelling Masterplan the Estate has plans to improve the quality of accommodation to meet modern day retail standards and improve the range and quality of products offered for sale. Providing an improved environment in which to display these goods is seen as key to the garden centres future success with improved retail display areas and replacement cafeteria -Holt garden centre is owned by Kelling Estate LLP. . The land to the south-east could accommodate an outside play area and wildlife trail. In addition a new stop could be provided for the North Norfolk Railway line. This could be brought forward in association with a longer walking trail through the estate improving public access to the countryside. The enhanced facilities would be particularly attractive to young families and railway enthusiasts, in addition to the garden centres existing customer base. Policy XXX – Holt Garden Centre Development proposals for expanded and improved facilities at the Holt Garden Centre, as outlined in the masterplan below, will be supported in principle subject to complying with other relevant policies of the Local Plan. We trust that these comments will be duly considered as the NNDC LP progresses. Should you have any further queries please do not hesitate to contact either myself or my colleague Roger Welchman.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN9)
Objection	1	No substantial issues raised. Respondents commented that the plan should be expanded to offer support for specific tourism opportunities.
Support	0	
General Comments	2	

Policy ECN6 - New-Build Tourist Accommodation, Static Caravans & Holiday Lodges

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN6	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerned that cliff-top caravan parks to sites within the undeveloped coast would be potentially harmful to the landscape; the policies should provide for the safeguarding of the landscape are essential. This could encroach into the local countryside and conflict with Policy SD4.	Noted: The policy approach calls for net benefits in terms of ant landscape and ecology when compared to existing business.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN6)
Objection	0	Caravan development on cliff tops was not supported due to concerns around impacts on the landscape.
Support	0	
General Comments	1	

Policy ECN7 - Use of Land for Touring Caravan & Camping Sites

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN7	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerned that cliff-top caravan parks to sites within the undeveloped coast would be potentially harmful to the landscape; the policies should provide for the safeguarding of the landscape are essential. This could encroach into the local countryside and conflict with Policy SD4.	Noted: Consider comments in the development the policy approach. The policy approach calls for no significant detrimental impacts in the areas landscape. ECN6 however calls for net landscape gain. Both policies should be reviewed for consistency along with SD11/12 Coastal adaptation.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN7)
Objection	0	Caravan development on cliff tops was not supported due to concerns around impacts on the landscape.
Support	0	
General Comments	1	

Policy ECN8 - New Build & Extensions to Tourist Attractions

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN8	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN8)
Objection	0	No comments received.
Support	0	
General Comments	0	

Policy ECN9 - Retaining an Adequate Supply & Mix of Tourist Accommodation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ECN9	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN9)
Objection	0	No comments received.
Support	0	
General Comments	0	

Policy ECN6 - New-Build Tourist Accommodation, Static Caravans & Holiday Lodges

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN6	Fullwood, Mr Tony (1217463)	LP644	Object	The policy is too permissive for the expansion of existing sites given the sensitive locations within which most existing sites are located. The scale of proposed development and the ability to absorb the development should be more closely related to the capacity of a location's infrastructure and the visual impact it will cause. Amend criterion 4 as follows: 4. in the case of business expansions and replacement developments, it is clearly demonstrated that the proposal would result in net benefit in terms of landscape impact and the screening of development throughout the year and ecology when compared to the existing development and would not have a significantly detrimental impact on the amenity of neighbouring land uses, nor on the character of the area or its infrastructure by virtue of increased activity and noise and also impacts on light and highway safety and the operation of the highway network.
ECN6	Tickle, Miss Gemma (1217353)	LP340	Support	To help local investment and financial support of local services I would like to request that a point is added to the policy so small scale development of 1-3 units can be built on vacant or derelict infill/rounding off plots in smaller villages and settlements outside development boundaries where the development meets the conditions of paragraph 10.50 (Holiday/Seasonal Occupancy and 140 day commercial letting). Often these plots are neglected and an eyesore for the village and community and it would be much better use if they could be bringing investment and visitor spend into the area rather than laying empty as an unsightly waste. This would be felt most beneficially in some of the smaller villages in the east of the district. I would respectfully request that an extra point is added between point 2 and 3 (which I'll call 2.b for now) as follows: New-build tourist accommodation, static caravans and holiday lodges(90)will be supported where: 1.the site lies within the settlement boundary of a selected settlement; or 2.the proposal is for the expansion of an existing business; or 2b (requested extra point). outside defined development boundaries in areas designated as Countryside small scale development of maximum 1-3 sustainable units would be permitted where it would result in infilling or rounding off in a predominantly built up area/settlement and only where it meets the conditions of paragraph 10.50 (Holiday/Seasonal Occupancy and 140 day commercially available letting). 3. the proposal is for a replacement static caravan site or holiday lodge accommodation which would result in the removal of an existing clifftop static caravan site or the relocation of existing provision which is within the Coastal Change Management Area or Environment Agency Flood Risk Zone 3;(91); and in the case of all of the above, in the case of business expansions and replacement developments, it is clearly demonstrated that the proposal would result in net benefit in terms of landscape and ecology when compared to the existing development and would not have a significantly detrimental impact on the amenity of neighbouring land uses , nor on the character of the area by virtue of increased noise and also impacts on light and highway safety and the operation of the highway network. Supporting evidence: NPPF Paragraph 84.On Planning policies encouraging opportunities to use land and sites that are physically well related to existing settlements. NPPF Paragraph 83.a) on Planning policies enabling sustainable growth in rural areas through well-designed new buildings. NPPF Paragraph 83.c) On Planning policies enabling 'sustainable rural tourism and leisure developments which respect the character of the countryside'.
ECN6	Johnson, Mr Jamie (1216384)	LP529	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Para 5.7 the economic prosperity of North Norfolk irrevocably linked to the success of the tourist sector. If sensitively conceived small scale developments of 1-3 units on infill/rounding off sites within existing settlements in the designated Countryside were permitted e.g. on both brownfield, derelict/neglected and greenfield sites, it could provide the desirable diverse mix of tourist accommodation more widely across

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>the district as well as delivering the 'positive impact on the economy' whilst also satisfying several NPPF policies on fostering and enabling a thriving sustainable rural economy without compromising the natural environment which draw tourists to the area whilst offering increased visitor options and year-round amenities. Following the loss of the current Local Plan's policy EC2 which allows the re-use of buildings in the countryside for holiday accommodation provided they comply with the former policy EC9 (Holiday and seasonal occupancy conditions' which restricts holiday use to short term lets/occupancy), I would suggest that such infill development in existing settlements in designated Countryside could be restricted to the same limitations mentioned in draft local plan paragraph 10.50 (holiday/seasonal occupancy conditions and 140 day commercial availability) to enable increased local investment and broader area-wide economic benefits. NPPF Paragraph 83 "Supporting a prosperous rural economy" states "planning policy and decisions should enable a) the growth and expansion of all types of businesses in rural areas" and also enable "c) sustainable rural tourism and leisure developments which respect the character of the countryside". If the conditions proposed below are deemed too lenient then I would suggest each development could be required to conform with 1 or more of the following suggestions: 1) It caters to 'eco tourist' holiday makers; specifically serving the district's long distance cycling and walking paths. (Similar low impact walking/hiking/cycling accommodation schemes have been highly successful across Canada, Scotland, etc.). Schemes could also cater to specific open air leisure enthusiasts such as paddle boarders, canoeists, etc. . 2) The development adds diversity to the tourist stay opinions by offering exemplary eco water, energy, construction and renewables efficiency. Such development would offer ultra-low emission and plug-in vehicle charging facilities, secure bicycle parking, include family bicycles as standard and follow growing trends towards low carbon semi-off grid tourist stays 3) The development would extend the tourist season. The development would also incorporate various biodiversity encouraging measures in its build and landscaping and could be partnered with local/national nature conservation groups such as Norfolk Wildlife Trust or The RSPB to promote the protection/appreciation/study of local/migrating species. . 4) The development would cater for wheelchair users and the elderly by incorporating accessible and adaptable facilities. . 5) The development would follow draft local plan's paragraph 10.49 (being situated in an area proven to be able to incorporate further visitor numbers without detrimental effect to the environment). . 6) The development would focus on an element of an Art/Craft/wellbeing retreat/workshops where participants make work as well as visiting and exploring distinctively local craft/cottage industries. . 7) The development celebrates Norfolk's culinary traditions and crafts where guests can attend workshops learning skills involving locally sourced ingredients whilst also visiting distinctively local food producers, makers and growers. . 8) The development celebrates Norfolk's architectural and historic assets. Some supporting evidence: NPPF Paragraph 80, 102, 131, 151 and 154.</p>
ECN6	Wilson, Mr Iain (Hill, Mr Iain Bidwells) (1217197 1217161)	LP304	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Whilst the general principle of Policy ECN6 is advocated, notably the support, in principle, for the development of new build tourist accommodation, it is requested that changes are made to the policy to ensure that it is consistent with, and sufficiently flexible to respond to, market requirements and conforms with the National Planning Policy Framework (NPPF). As drafted, Policy ECN6 contains a presumption against new build tourist accommodation in the countryside, unless it relates to the expansion of an existing business; precluding the opportunity for new business ventures to locate in a rural area. This is notwithstanding that at paragraph 10.49 of First Draft Local Plan (Part 1) it states that in order to support the tourism economy and provide facilities that will also benefit the local community 'new tourist accommodation and attractions will be permitted in areas that can accommodate additional visitor numbers without detriment to the environment.' It is, therefore, suggested that rather than excluding new build tourist</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				accommodation in the countryside, Policy ECN6 should recognise that applications for new build tourist accommodation, which is not linked to an existing business, will be permitted in the countryside where it can be demonstrated that the proposal would not have a detrimental impact on the environment. It is, therefore, recommended that the policy is revised in order to ensure that the policy is consistent with the NPPF and, crucially, that the requirements of the tourism sector are met, allowing the economic benefits detailed at paragraph 10.45 to be realised
ECN6	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
ECN6	Rice, Mr Colin (1210475)	LP131	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 1. By permitting individual holiday homes that build on the character of such homes in the coastal strip (as recognised in the LCA p.155), some of the demand for second homes could be met without there being a negative effect on availability of the existing housing stock for local people. 2. As noted in NPPF paragraph 154, LPAs should recognise that even small-scale projects provide a valuable contribution to cutting GHG emissions and indeed can act as exemplars.
ECN6	Rice, Mr Colin (1210475)	LP132	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: The plan as drafted does not recognise the place of small scale holiday cabins that are not situated within large scale commercial caravan or chalet parks. These currently form part of the long-established character of places such as Bacton, Walcott, Eccles, and Sea Palling and are overlooked in the plan. By allowing small-scale growth and development, the existing communities will continue to prosper and the demand for second homes could be met without such disruption to the general housing market. This would be in accordance with NPPF paragraph 83(c) which says that 'Planning policies and decisions should enable sustainable rural tourism and leisure developments which respects the character of the countryside'.

Individuals	Number Received	Summary of Responses (Policy ECN6)
Summary of Objections	3	Objections recognised the importance of tourism to the North Norfolk economy, however comments were mixed with some considering the expansion of existing sites within sensitive locations as too permissive and the policy should consider the scale of development, the infrastructure available in that location and the visual impact of development. Other respondents felt that the policy should be more flexible and allow new build tourist accommodation in the countryside which doesn't have a detrimental impact on the environment. Such as small scale tourist accommodation infill / rounding off built up areas and existing settlements that meet certain criteria. In order to provide a mix of accommodation across the district and deliver positive impact on the economy without compromising the natural environment.
Summary of Supports	2	Support for the approach suggested that the policy should also allow for small scale development on vacant/ derelict infill/ rounding off plots in smaller villages outside development boundaries which are subject to holiday occupancy conditions. To improve neglected sites and bring investment into the

		area, which is considered could be especially beneficial to small villages in the east of the District. Development should not be at the expense of any environmental policies and subject to similar requirements to HOU6.
Summary of General Comments	2	Respondents suggested that by allowing individual holiday homes that build on character of the homes in the coastal strip would meet some of the need for second homes without have a negative effect on the availability of the existing housing stock for local people. LPAs should recognise that even small-scale projects provide a valuable contribution to cutting GHG emissions. The policy as drafted doesn't recognise the importance of allowing small scale holiday cabins in places such as Bacton, Walcott, Eccles and Sea Palling where these currently form part of the long-established character and would allow existing communities to prosper and also meet the demand for second homes.
Overall Summary		Some support for this policy, recognising the importance of tourism and the environment on North Norfolk's economy. The majority of comments suggest that the policy should be more flexible and allow for small scale tourist accommodation which wouldn't (their emphasis) have a detrimental impact on the environment within the countryside rather than just be focused on the settlement hierarchy. However, another respondent considered the policy to be too permissive, need to carefully consider potential impact of extending existing businesses within sensitive locations.
Council Response		Noted Consider comments in the finalisation of the policy and in relation to core strategy policy EC 2, and general consistency with other rural policies and those in relation to the expansion of existing business'

Policy ECN7 - Use of Land for Touring Caravan & Camping Sites

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN7	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
ECN7	Johnson, Mr Jamie (1216384)	LP523	Object	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Make a case for an amendment to criterion 3 changing the excluded area to flood risk zone to 3b only so that small scale sites (of upto 5 units) in flood zone 2, 3a or 'dry islands' could be permitted where they are protected by hard sea defences (where the adopted defence strategy is predicted by to “Hold the Existing Line” for the next 85 years until at least the year 2105 (Coastal Management Study). As some Flood Zone 3a land is deemed less suitable for building permanent residential dwellings it would seem that a good way to utilise such land would be for sensitively landscaped low impact glamping/shepherds hut sites (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). This would allow such land to meet economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside. These sites would have to meet criterion 4 of policy ECN7 and would provide a low impact sustainable addition to the tourist offer and would be in line with the stipulation stated in NPPF paragraph 83. on "Supporting a prosperous rural economy"; "planning policy should enable a) the growth and expansion of all types of businesses in rural areas" and also enable "c)sustainable rural tourism and leisure developments which respect the character of the countryside” .Amend criterion 3 ‘Flood Risk Zone 3’ to ‘3b’ to allow small scale sites of up to 5 units in flood zone 2, 3a or 'dry islands'.</p> <p>The use of land(92) for touring caravan and camping sites(93)will be supported where: 1. the site lies within the settlement boundary of a selected settlement; or 2. the proposal is for the expansion of an existing business; or 3. (requested amended point) the site lies outside of the boundary of a selected settlement but does not lie within the AONB, Heritage Coast, Undeveloped Coast or Environment Agency Flood Risk Zone 3b. Sites which lie in areas protected by hard sea defences in flood zones 2 and 3a will be supported where seasonal usage restrictions are applied to mitigate against flood risk.* . *If more restrictions where deemed desirable then potential 2 and 3a Flood Zone sites could be made to satisfy one or more of the following conditions. Sites are: 1) are small in scale being 5 units or less, 2) are within a Tourism Asset Zone, 3) are compliant with local draft plan paragraph 10.50 (holiday occupancy restricted with 140 day commercially available lettings stipulation), 4) are comprised solely of Shepherds huts (which are less visually imposing on the landscape and encourage a diverse low impact tourist stay option aside from traditional camping). (Also their raised design makes them much more in keeping with the current flood resilience advice from the environment agency). 5) are accompanied by a site specific Flood risk assessment detailing compulsory flood safety measures such as warning systems and egress routes etc. 6) The sites would fall within infill/rounding off sites within existing settlements/predominantly built up areas within designated Countryside. 7) Each unit will be highly sustainable using Solar PV/solar thermal, renewable technologies and other sustainable off grid technologies for water, heating and power efficiency and sustainability. Sites could cater specifically for the district's long distance walking and cycling paths to avoid travel by car and also provide family bicycles, secure bicycle parking and charging points for ULE and plug-in vehicles. . Any proposed site within flood zone 2 or 3a where protected by hard sea defences would still have to meet the criterion in point 4 of the policy ECN7.</p>

Individuals	Number Received	Summary of Responses (Policy ECN7)
Summary of Objections	1	Objection focused on allowing a more permissive approach and made the suggestion that the policy should allow for: small scale sites of up to 5 units in flood zone 2, 3a and 'dry islands' and low impact glamping/shepherds hut sites in Flood Zone 3b (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). To allow this land to meet economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside.
Summary of Supports	1	One comment in support of this policy but development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		Limited comments and no substantive issues raised. Objection focused on allowing a more permissive approach by allowing more flexible development of small scale sites of up to 5 units in flood zone 2, 3a and 'dry islands' and low impact glamping/shepherds hut sites in Flood Zone 3b (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). Stating that this would allow economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside. One comment received in support of this policy but suggests that development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Council's Response		Support noted. Disagree with a more flexible approach around flood risk. The National Planning Policy Framework sets strict tests to protect people and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, national policy is clear that new development should not be allowed. In plan-making, local planning authorities apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk.

Policy ECN8 - New Build & Extensions to Tourist Attractions

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN8	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.

Individuals	Number Received	Summary of Responses (Policy ECN8)
Summary of Objections	0	None received
Summary of Supports	1	One comment of support received, development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised.
Council's Response		Noted

Policy ECN9 - Retaining an Adequate Supply & Mix of Tourist Accommodation

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ECN9	Johnson, Mr & Mrs (1215700)	LP143	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.

Individuals	Number Received	Summary of Responses (Policy ECN9)
Summary of Objections	0	None received
Summary of Supports	1	One comment of support received, Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised.
Council Response		Noted

Policy ECN6 - New-Build Tourist Accommodation, Static Caravans & Holiday Lodges

Individuals	Number Received	Summary of Responses (Policy ECN6)
Summary of Objections	3	Objections recognised the importance of tourism to the North Norfolk economy, however comments were mixed with some considering the expansion of existing sites within sensitive locations as too permissive and the policy should consider the scale of development, the infrastructure available in that location and the visual impact of development. Other respondents felt that the policy should be more flexible and allow new build tourist accommodation in the countryside which doesn't have a detrimental impact on the environment. Such as small scale tourist accommodation infill / rounding off built up areas and existing settlements that meet certain criteria. In order to provide a mix of accommodation across the district and deliver positive impact on the economy without compromising the natural environment.
Summary of Supports	2	Support for the approach suggested that the policy should also allow for small scale development on vacant/ derelict infill/ rounding off plots in smaller villages outside development boundaries which are subject to holiday occupancy conditions. To improve neglected sites and bring investment into the area, which is considered could be especially beneficial to small villages in the east of the District. Development should not be at the expense of any environmental policies and subject to similar requirements to HOU6.
Summary of General Comments	2	Respondents suggested that by allowing individual holiday homes that build on character of the homes in the coastal strip would meet some of the need for second homes without have a negative effect on the availability of the existing housing stock for local people. LPAs should recognise that even small-scale projects provide a valuable contribution to cutting GHG emissions. The policy as drafted doesn't recognise the importance of allowing small scale holiday cabins in places such as Bacton, Walcott, Eccles and Sea Palling where these currently form part of the long-established character and would allow existing communities to prosper and also meet the demand for second homes.
Overall Summary		Some support for this policy, recognising the importance of tourism and the environment on North Norfolk's economy. The majority of comments suggest that the policy should be more flexible and allow for small scale tourist accommodation which wouldn't (their emphasis) have a detrimental impact on the environment within the countryside rather than just be focused on the settlement hierarchy. However, another respondent considered the policy to be too permissive, need to carefully consider potential impact of extending existing businesses within sensitive locations.
Council Response		Noted. Consider comments in the finalisation of the policy and in relation to core strategy policy EC 2, and general consistency with other rural policies and those in relation to the expansion of existing business'

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN6)
Objection	0	Caravan development on cliff tops was not supported due to concerns around impacts on the landscape.
Support	0	
General Comments	1	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN6)
Objection	2	Broad support for the proposed policy wording. Representations raised the need to clarify definitions within the policy. One respondent set out that the policy is too restrictive and should be made more flexible.
Support	4	

General Comments	2	
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Policy ECN7 - Use of Land for Touring Caravan & Camping Sites

Individuals	Number Received	Summary of Responses (Policy ECN7)
Summary of Objections	1	Objection focused on allowing a more permissive approach and made the suggestion that the policy should allow for: small scale sites of up to 5 units in flood zone 2, 3a and 'dry islands' and low impact glamping/shepherds hut sites in Flood Zone 3b (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). To allow this land to meet economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside.
Summary of Supports	1	One comment in support of this policy but development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		Limited comments and no substantive issues raised. Objection focused on allowing a more permissive approach by allowing more flexible development of small scale sites of up to 5 units in flood zone 2, 3a and 'dry islands' and low impact glamping/shepherds hut sites in Flood Zone 3b (using restricted seasonal occupancy, flood warning technologies and selected egress routes to mitigate against risk). Stating that this would allow economic, social and environments gains for the area whilst having very low impact on the character of the surrounding Countryside. One comment received in support of this policy but suggests that development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Council's Response		Support noted. Disagree with a more flexible approach around flood risk. The National Planning Policy Framework sets strict tests to protect people and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, national policy is clear that new development should not be allowed. In plan-making, local planning authorities apply a sequential approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN7)
Objection	0	Caravan development on cliff tops was not supported due to concerns around impacts on the landscape.
Support	0	
General Comments	1	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN7)
Objection	0	General support expressed with only minor suggestions raised in regard to the wording of the policy.
Support	3	
General Comments	1	

Policy ECN8 - New Build & Extensions to Tourist Attractions

Individuals	Number Received	Summary of Responses (Policy ECN8)
Summary of Objections	0	None received
Summary of Supports	1	One comment of support received, development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised.
Council's Response		Noted

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN8)
Objection	0	No comments received.
Support	0	
General Comments	0	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN8)
Objection	0	Limited comments received, no substantive issues raised. The approach was broadly supported, however one respondent thought the approach was unduly restrictive in regard to the AONB, Heritage Coast or Undeveloped Coast.
Support	1	
General Comments	1	

Policy ECN9 - Retaining an Adequate Supply & Mix of Tourist Accommodation

Individuals	Number Received	Summary of Responses (Policy ECN9)
Summary of Objections	0	None received
Summary of Supports	1	One comment of support received, Development should not be at the expense of any ENV policies and subject to similar requirements to HOU6.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised.
Council Response		Noted

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ECN9)
Objection	0	No comments received.
Support	0	
General Comments	0	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ECN9)
Objection	1	No substantial issues raised. Respondents commented that the plan should be expanded to offer support for specific tourism opportunities.
Support	0	
General Comments	2	

Economy Policies

Alternative Policies (Economy)

The purpose of the Alternatives Considered document was to detail, and receive feedback on, the alternative policy options which the Council has considered in preparing the First Draft Local Plan.

This table details comments made against the **Alternatives Considered consultation document**. However, many respondents also used this document to comment on 'Preferred Options', e.g. the policies favoured by the Council and as detailed in the **First Draft Local Plan Part 1 consultation document**. The table below brings together three scenarios in which comments were made relating to the Alternatives Considered document. These are when a respondent commented on:

- a **preferred policy option** in the Alternatives Considered document
- an **alternative policy option** in the Alternatives Considered document
- an **alternative policy option** in the First Draft Local Plan

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
ECN1	Mr & Mrs Johnson (1215700)	AC042	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Employment areas should consider the availability of local workforce and not encourage commuting and travel of long distances.	Comments noted: This comment repeats the support ECN1 made against the First Draft Local Plan (Part 1).
ECN2	N/A	N/A	N/A	No comments received.	N/A
ECN3	Mr & Mrs Johnson (1215700)	AC043	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Should not be implemented at the expense of HOU6 which should also apply as far as possible to employment development.	Comments noted: This comment repeats the support ECN3 made against the First Draft Local Plan (Part 1).
ECN4	Mr & Mrs Johnson (1215700)	AC044	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 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).
ECN5	N/A	N/A	N/A	No comments received.	N/A
ECN6	Mr & Mrs Johnson	AC045	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Partially Supports Assessment ECN6 - Development should not be at the expense of any ENV policies and	Comments noted: This comment repeats the support ECN6 made

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
	(1215700)			subject to similar requirements to HOU6.	against the First Draft Local Plan (Part 1).
ECN7	N/A	N/A	N/A	No comments received.	N/A
ECN8	N/A	N/A	N/A	No comments received.	N/A
ECN9	N/A	N/A	N/A	No comments received.	N/A

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
ECN1	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
ECN2	0	0	0	No comments received.
ECN3	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
ECN4	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).
ECN5	0	0	0	No comments received.
ECN6	0	1	0	This comment repeats the support for the preferred option made against the First Draft Local Plan (Part 1). No comments were received on the alternatives.
ECN7	0	0	0	No comments received.
ECN8	0	0	0	No comments received.
ECN9	0	0	0	No comments received.