

Appendix 1 - Schedule of Representations

Extract of Report of Representations

References to 'OFFICER SUMMARY' indicate that lengthier submissions were made and have either been summarised or separated out into relevant policy or site areas. The original representation can be viewed in full by searching the LP ref number at: <http://consult.north-norfolk.gov.uk/portal>

Policy ENV1 - Norfolk Coast AONB & Broads

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP258	Object	<p>Policy ENV 1 states that: 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced.' The policy goes on to note that: 'Proposals for 'major development' in the Norfolk Coast Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as asset out in national policy.' Major development is defined in the Glossary of the NPPF as 10 or more dwellings. However, footnote 77 of the NPPF notes that this is 'other than for the specific purposes of paragraphs 172 and 173 in the Framework', i.e. this definition of major development does not apply in the AONB; as set out in Footnote 41 of the Plan, what constitutes major development in the AONB is a matter for the decision maker, taking into account a number of criteria. Roughton lies at the southern extent of the Norfolk Coast AONB. Our client's site, Land north of Chapel Road, Roughton, lies within the AONB. We suggest that development of 13 units on this site would not constitute major development in this context. Such a development would comply with the description of small scale development set out in Policy ENV 1; it is small scale, it would meet an identified local need for housing, and it is considered that the site does not make a contribution to the natural beauty and character of the area as it has existing development to the north and south, and is relatively contained and separated from the AONB by the sloping topography. My client's other site, land to the east of Norwich Road, lies some 120m outside the AONB. However, the indicative masterplan which has been submitted in support of the representations (Appendix B) has taken account of the presence of the AONB to the North, and has sought to minimise the visual impact of the development by creating a natural woodland buffer along the northern boundary, and by setting back the properties from the A140, with generous planting and natural drainage features.</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV1	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county's biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV1	Mr Phillip Duncan (1217309)	LP387	Object	Proposed Policy ENV1 The approach suggested is "in the Norfolk Coast Area of Outstanding Natural Beauty will be refused except in exceptional circumstances and where it can be demonstrated that they are in the public interest as set out in national policy(42)" where Footnote 42 reads..... "42 This does not apply to development sites allocated by the Local Plan because the need for those developments and scope for them to be accommodated elsewhere outside the Area of Outstanding Natural Beauty was assessed during Plan preparation." We do not consider the assessments conducted are sufficient to justify the approach proposed in Footnote 42. Our detailed comment on the Site Selection Methodology Background Paper 6 is set out in the attached analysis and feedback.
ENV1	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP659	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV 1 states that: 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced.' This positive attitude to development in the AONB is welcomed. The site lies within the AONB, for five homes will be designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape. The scale and character of the properties will reflect their setting, and the associate landscaping will ensure that they integrate into the environment.
ENV1	Ringer, Mr Callum (1218561)	LP772	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Object to any proposal to increase the AONB due to the impact this will have on house prices and the ability to build affordable homes.

Individuals	Number Received	Summary of Responses (Policy ENV1)
Summary of Objections	3	One objected to the policy in that suitable development necessary to meet identified local housing need that does make a contribution to the natural beauty and character of the area should be allowed in the AONB. Remaining objections focused on the principle of development in the AONB , due to the impact on affordability of house prices and disagreed with the premise of allocation in the AONB throughout the plan
Summary of Support	2	Two support this policy, for the protection of the AONB. One comments that suitable development which is designed to minimise the visual impact, and to respect and enhance the setting of the environment and the landscape should be allowed. Suggest that other important areas of wildlife habitat and biodiversity should be given similar protection.

Summary of General Comments	0	None received.
Overall Summary		Support received for the protection of the AONB, some suggest that suitable development necessary to meet identified local housing should be permitted under this policy. And suggest that other important areas of wildlife habitat and biodiversity should be given similar protection. One objection disputes the approach to allocations in the AONB, that assessments are not sufficient to justify these developments (Footnote 42).
Council's Response		Comments noted: National policy dictates that whether a proposal is major development in the AONB is a matter for the decision maker, taking into account its nature, scale and setting. The local Plan sets out the strategic policies - individual planning applications will be assessed on its own merits against the whole development Plan.

Parish and Town Councils

No Comments received

Organisations and Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV1	Broads Authority (321326)	LP806	General Comments	As this is a planning document, suggest you say that the 'Broads has a status equivalent to a National Park' or that the 'Broads is a member of the National Park family' rather than 'Broads National Park'. • ENV1 – our special qualities are listed in 7.4 of our Local Plan if that helps. DM1 is our Major Development policy. Might be helpful to refer to these? https://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/1571299/FINAL-Local-Plan-for-the-Broads-May-2019-Appendix-1-ba170519.pdf . Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities 'will be carefully assessed'. But there is no instruction to developers to 'demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance....' as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other	Noted: Consider feedback in the development of this policy
ENV1	Natural England (1215824)	LP718	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Approach supported. Development proposals brought forward through the Plan should avoid significant impacts on protected landscapes, including those outside the Plan's area and early consideration should be given to the major development tests set out in paragraph 172 of the National Planning Policy Framework (NPPF).	Support welcomed
ENV1	Norfolk County Council (931093)	LP739	Support	We support the policy and supporting text (8.16) to protect and enhance Landscape and Settlement Character, particularly in relation to the area defined as the setting of Sheringham Park which is particularly susceptible to pressures	Support noted

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV1	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP500, 501,502, 504	Support	<p>8.5 – More of an observation but our Integrated Landscape Character Assessment which was undertaken with our partner Local Authorities meant that our character types all dovetailed and enabled a more coordinated response to planning applications. With the changes to the new LCA it has meant that a couple of the character types are now different to our character types. A decision needs to be made as to whether we commission a new LCA and work to integrate these new changes, or whether we don't have our own LCA for the AONB and refer to the Local Authorities LCA'S. This is a conversation that can be had with the Landscape Officers to decide a way forward. 8.6- Could the newly formed county GI and Monitoring group be mentioned? 8.11 We welcome the mention of NPPF para 172. - Policy ENV1 – 'Development will be supported where it is small scale; meets an identified local need and the natural character and beauty of the area is conserved and where possible enhanced'. Would like to see the words 'where possible' deleted, as this is too vague for developers. Biodiversity net gains means developers SHOULD be enhancing. Also in the last paragraph of this policy please add that appropriate studies including HRA/LVIA are undertaken. Another example of an AONB policy that has been tested is as follows and could be adapted or partly adapted: Permission for major developments in the Norfolk Coast Area of Outstanding Natural Beauty will be refused unless exceptional circumstances prevail as defined by national planning policy. Planning permission for any proposal within the AONB, or affecting the setting of the AONB, will only be granted when it: a. conserves and enhances the Norfolk Coast AONB's special qualities, distinctive character, tranquillity and remoteness in accordance with national planning policy and the overall purpose of the AONB designation; b. is appropriate to the economic, social and environmental wellbeing of the area or is desirable for its understanding and enjoyment; c. meets the aims of the statutory Norfolk Coast AONB Management Plan and design advice, making practical and financial contributions towards management plan delivery as appropriate; d. in keeping with the Landscape Character Assessment by being of high quality design which respects the natural beauty of the Norfolk Coast, its traditional built character and reinforces the sense of place and local character; and avoids adverse impacts from individual proposals (including their cumulative effects), unless these can be satisfactorily mitigated.</p>	Comments noted : consider comments in the finalisation of the LCA SPD, consider comments in the finalisation of policy ENV1
ENV1	Environment Agency (1217223)	LP459,460,461	General Comments	<p>One missing aspect which should be included is the consideration of designated bathing waters (bathing water directive) and Shellfish water sites in relation to the importance of maintaining good water quality to preserve the standards of these sites. North Norfolk has several designated bathing waters where the bacterial content of any waters discharging nearby can affect the status. Any development in the area draining close to a bathing water should be required to ensure that their discharges do not increase the bacterial content of the waters discharging to the sea where at all possible, in order to safeguard the quality of the bathing water Bathing waters are</p>	Noted: Consider comments in the development the policy and future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>important for local tourism to this district. Paragraph 8.2 This section could be enhanced to include policies relating to other priority habitats including: • Chalk streams • Traditional Orchards • Ponds In addition, 'green infrastructure retention' and enhancement' could also be widened to include the creation of new green infrastructure, beyond what is already there. It is noted that reference to new and enhanced green infrastructure is made in paragraph 8.9. We have included further comments here. Paragraph 8.4 We are pleased to see that the plan is acknowledging the need for a Habitats Regulation Assessment. The Environment Agency would welcome the opportunity to comment on the HRA once complete. • Paragraph 8.9 We are pleased to see that following on from our response to paragraph 8.2, this section does include 'new' as well as enhanced green infrastructure. It would be beneficial if this point was made consistently throughout the document. Creating new habitat is essential in reaching the target of biodiversity 'net gain', and linking existing habitats through the creation of new woodland or wildflower corridor, filed margins or even recreational greenspace. Paragraph 8.10 This paragraph acknowledges that development in North Norfolk can affect the Broads in a variety of ways. We agree that development and subsequent population growth may increase visitor pressures on the Broads National Park (as well as other designated sites). The paragraph should also include impacts associated with abstraction. Any smaller scale developments without connection to mains water that will rely on de-minimus abstraction of 20 cubic metres per day of unlicensed water use should have requirements to minimise water usage for example rainwater harvesting or the re-use of grey water. The plan should identify if there are areas where the de-minimus level of abstraction would cause unacceptable harm and allow scope to restrict development or activity where this is the case. This should also apply to other sensitive waterbodies that might fall outside the Broads designation. • Policy ENV 1 – We welcome the inclusion of this policy, specifically where it refers to opportunities to enhance.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV1)
Objection	0	The approach was supported. References to "were possible" could be strengthened to should in order to emphasis developers should be enhancing Biodiversity.
Support	3	
General Comments	2	

Responses on Alternatives

No comments received on the alternative approach presented

Policy ENV2 - Protection & Enhancement of Landscape Character

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV2	Bell, Ms Jane (1218416)	LP799	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Support; I trust that the Council will be faithful to the landscape protection objectives set out in this policy, given all the pressures for building development pp. 94, 95, 96 Par. 8.22, s.23.
ENV2	Mr Phillip Duncan (1217309)	LP388	Object	Proposed Policy ENV2 refers to the Landscape Sensitivity Assessment (LSA). However we note that the LSA is not applicable to all types of development as it only considers renewables and reservoirs. Clarification needed.

Individuals	Number Received	Summary of Responses (Policy ENV2)
Summary of Objections	1	No substantive issues raised - clarification that the Landscape Sensitivity Assessment is not applicable to all types of development and only considers renewable energy development and reservoirs.
Summary of Supports	1	One comment of support received.
Summary of General Comments	0	None received.
Overall Summary		No substantial issues raised. Protection should be given to important areas of wildlife habitat and biodiversity. Clarification required as to scope of LCA and LSS.
Council's Response		Noted. The LSS assessed the sensitivity of the Norfolk landscape to the various types of renewable and low carbon development. The LCA identifies the landscapes valued features and acts as a framework for decision making that respects local distinctiveness

Parish and Town Councils

No comments received

Organisations and Statutory Consultees

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV2	Broads Authority (321326)	LP806	General Comments	What are the settlement character studies referred to in this report? Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities 'will be carefully assessed'. But there is no instruction to developers to 'demonstrate that their location, scale, design and materials will protect, conserve and, where	Concerns Noted: Consider feedback in the development of this policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				possible, enhance...’ as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other	
ENV2	Natural England (1215824)	LP719	General Comments	We welcome the commitment to enhance connectivity to surrounding green infrastructure and Public Rights of Way networks. We suggest that enhancement also facilitates wildlife through management of footpath edges/verges to increase biodiversity where possible.	Noted: Consider comments in the development of the policy
ENV2	Gladman Developments, Mr Craig Barnes (1217131)	LP281	Object	Gladman acknowledge the need to ensure that the environment is sufficiently protected through new developments with net gains provided where possible. Gladman broadly support Policy ENV2 and the list of criteria to be considered in the design of new development and consider it helpful to avoid later delay and potential refusal of development. Gladman is however concerned that the current wording of the policy referring to gaps between settlements (as set out in Point 2 of the Policy) may be confused to mean any gap between settlements, no matter how significant a distance it is, as a reason to resist development proposals. The interpretation of the policy in this way may place significant constraints on new development leading to a blanket and unjustified protectionist policy. Proposed changes: To address this, Gladman consider that Point 2 of the Policy should be reworded to make clear that only the most sensitive of gaps will be considered under this policy, where settlements are visible from one another and/or the gap between settlements perceptibly small/weak. The scale and type of development proposed should also be a key factor by the Council in determining the suitability of a development against this policy.	Noted: Consider feedback and clarification in relation to bullet 2 in the development of this policy
ENV2	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP505	Support	Policy ENV 2 -Again strike out ‘where possible’ enhance as too vague. There is an onus on developers to enhance now so this needs to be clear. We welcome the mention of nocturnal character and also support the expectation to demonstrate mitigation and enhance connectivity to GI	Comments noted : Consider comments in the finalisation of the policy
ENV2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Amend Criterion 7 from Historic Parks and Gardens to Registered Parks and Gardens.	Noted- consider amending the wording in the preparation of the policy
ENV2	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Presume Setting of Sheringham Park is based on the Zone of Visual Influence identified by the National Trust in 2005/6. The setting of heritage assets can change over time and also the setting is more than just visual links but encompasses other factors such as noise, odour, light and how an asset is experienced. We would therefore be cautious	Noted - consider discussions with Historic England regarding Sheringham Park through the

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				about including this on the policies map and suggest that we discuss this matter further with you in advance of the next iteration of the plan.	preparation of the policy.
ENV2	RSPB (1217391)	LP434	General Comments	This is a positive policy, but the position on enhancements should be stronger. There are many options that can be low cost that could deliver enhancements for the environment. This should be required and would be compatible with net gain requirements set out in the NPPF. Proposed change: Remove "must strive" and state that developments will be required to WFD targets and support water quality improvements in line with net gain requirements for the environment.	Noted - consider the removal of the wording 'must strive' and state that new developments will be required to WFD targets and support water quality improvements in line with the net gain requirements for the environment.
ENV2	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Acknowledges the importance of protecting landscape and settlement character, particularly in designated areas, and the policy should reflect this. However, the policy should also be formulated in such a way that development is not limited where landscape constraints can be addressed by appropriate mitigation. This will ensure the policy is effective and consistent with national policy (NPPF chapter 15). The supporting text to Policy DS7 acknowledges at paragraph 13.26 that the Duchy of Cornwall's site at Fakenham is not constrained in terms of landscape.	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV2)
Objection	3	The approach was recognised as giving strength to protection & enhancement of landscape & settlement character. objections and advice focused on references to "were possible" and "must strive "could be strengthened to should in order to emphasis developers should be enhancing Biodiversity. Further clarity could be considered and the policy formulated in such a way that development is not limited where landscape constraints can be addressed by appropriate mitigation. Clarification sought on bullet 2 making clear only the most sensitive gaps.
Support	2	
General Comments	3	

Alternatives

No comments received

Policy ENV4 - Biodiversity & Geology

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Yardley, Mr Christopher (1218066)	LP688	Support	<p>~I would also like to emphasize that the starting point for development should not be how to bolt on supposed 'net gain' in a specific development but to look to understand the impacts of the development on the existing site and wider biodiversity of the area</p> <p>~I would also like to suggest that the policy be amended to include an additional key fourth point after 'all development proposals should' to the effect that the Council will engage with NGOs contributions towards the enhancement of biodiversity. Support additions to the proposed wording of the policy to enhance the value and meaning of the policy in line with NPPF guidance and wider community involvement.</p>
ENV4	Spowage, Mr Richard (1216878)	LP326	General Comments	<p>There is a need to emphasise councils duty to protect and enhance all wildlife and ensure suitable ecological information is supplied with any proposal to ensure correct mitigation is achieved both pre development, to prevent loss of species from sites, to post development ensuring long term protection and management of proposed mitigation. In addition the is need to ensure wildlife habitat mitigation is the primary aim and not part of a strategy of public open space which could be detrimental to target species. In addition mitigation needs to have regard for habitat connectivity seeking to link habitats and avoid fragmentation.</p>
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided</p>
ENV4	Bell, Ms Jane (1218416)	LP799	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Strongly support the aims in paragraphs 8.22 & 8.23 and consider that those in paragraph 8.22 are of the highest importance. I am delighted to note that the 'provision of 'wildlife homes' is now an official stipulation with regard to ' development proposals'. However, I question the last paragraph (p. 96). If a 'designated site (etc.) may be adversely affected by a development proposal', why should the council consider a development application in the first place, if it is going to cause inevitable, irreversible ecological damage? That is what 'adversely affected' means. pp . 129; 135 – 137 Par. 9.49, 9.50</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Duncan, Mr Phillip (1217309)	LP396	Object	Proposed Policy ENV4 This proposes that developer contributions will be required based on “the emerging Recreational Impact Avoidance and Mitigation Strategy 57” . Footnote 57 confirms that “A Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy (RAMS) is currently being commissioned collectively by the Norfolk Authorities and Natural England”. We do not consider it reasonable to propose a policy based on a study which has only just been commissioned, and for which there are no proposals for public consultation set out.
ENV4	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: All developments should be subject to an environmental impact assessment to ensure they minimise their carbon footprint and an equality impact assessment to ensure they benefit all residents
ENV4	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Suggest a bold new environmental initiative by NNDC to aim to make North Norfolk a red squirrel only District by the end of this planning period. It would mean building on the start made by the Holkham estate and persuading land owners and residents on the land to the south to eliminate gradually the grey squirrel. This would for a start save the National Trusts woods at Felbrigg from the appalling damage inflicted on them by lack of control of grey squirrels, and is in tune with the HMG initiative to plant more trees. Other D.C’s and counties would follow this initiative but NNDC could take most of the credit.
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: There are many other really important areas within the county that should also be given similar priority. It is a fact that the current coastal habitat and AONB will be lost due to erosion in the future. If biodiversity is to be preserved then wildlife must have other areas to move to. Unless inland areas of wildlife habitat and biodiversity are similarly protected from inappropriate development there will be a gradual reduction in the county’s biodiversity and important wildlife habitat. Inland wildlife habitat is also a natural resource that enhances the lives and physical and mental well-being of residents, promotes tourism and associated businesses and adds to the character of the area.
ENV4	Dixon, Cllr Nigel (1218612)	ILP738	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Ensure layout and land usage creates maximum habitat and area connectivity for wildlife and promotes the recreation of ecosystems essential to address part of the climate change agenda. The Plan should incorporate a requirement to involve a recognised wildlife conservation or preservation authority to both advise on the layout of major sites and become a delivery and maintenance partner.

Individuals	Number Received	Summary of Responses (Policy ENV4)
Summary of Objections	2	Two objections raised the issue of emerging evidence. Not reasonable that the RAMS evidence to support this policy has only just been commissioned. One suggests that Environmental Impact Assessment and Equality Impact Assessment should be required on all development.
Summary of Supports	4	Policy considered important to the well-being of residents, the character of the area and tourism. One remarks that development on farmland would have less impact environmentally, and that development of land that currently provides biodiversity should be avoided. One questions why if 'a designated site will be adversely affected by a development proposal', the council should consider a development in the first place.
Summary of General Comments	3	General comments received focused on the need to ensure layout and land usage creates maximum habitat and area connectivity for wildlife and promotes the recreation of ecosystems essential to address part of the climate change agenda. Suggest that the policy should emphasise the council's duty to protect and enhance all wildlife, ensure that suitable information is submitted with any proposal to ensure mitigation can be achieved. Mitigation needs to ensure habitat connectivity and avoid fragmentation. One wishes North Norfolk becomes a red squirrel only District. A wildlife conservation or preservation authority should advise on the layout of major sites and become a delivery and maintenance partner.
Overall Summary		General support for this approach, majority of comments focus on how the policy could go further to protect biodiversity; that EIAs should be required on all development, and to ensure that suitable information is submitted during the pre-application stage to ensure mitigation is achieved. No development should be permitted on sites that currently provide biodiversity and where development would have an adverse impact on a designated site. A wildlife conservation or preservation authority should advise on the layout of major sites and become a delivery and maintenance partner.
Council's Response		Noted. Support welcome. We value the enhancement of biodiversity and geodiversity and the opportunity to create/improve habitats to support wildlife through biodiversity net gain. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites. Such a requirement has been identified through the interim Habitat Regulation Assessment which is available alongside this consultation statement and is included in advice from Natural England.

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV4	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV4)
Objection	0	No comments received.
Support	0	
General Comments	0	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Broads Authority (321326)	LP806	General Comments	8.23 – is the Landscape Character Assessment date correct? Should it be 2019? Could refer to Broads Landscape Character Assessment, Broads Landscape Sensitivity Study and Broads Biodiversity Action Plan too. • ENV4: is 'should' a strong term? Could it say something like 'are required to' or 'shall'? ENV5 for example says 'will'.	The LCA is dated 2018. Consider additional comments in the finalisation of the Plan
ENV4	Environment Agency (1217223)	LP463,464	General Comments	We welcome the inclusion of policy ENV 4. This should be further enhanced to extend the policy to include non-statutory designated sites (CWS and UK BAP habitats). Any development proposal that is put forward for a CWS or UK BAP site could be scoped out at an early stage. If future development is restricted to agricultural land, maintaining existing green infrastructure (for example, hedgerows), there is a far greater potential that the development could bring overall net gain for biodiversity. • Paragraph 8.20. We would also like to see protection extended to non-statutory designated sites such as County Wildlife Sites (CWS) and UK BAP priority habitats (including chalk streams). Paragraph 8.21 and 8.22 We are pleased to see the reference to Biodiversity net gains in these paragraphs. The paragraph would be further enhanced by being extended to include scope for habitat creation to occur beyond the boundary of the development site. This has the potential to allow for a greater expansion and connectivity of existing habitats expected through the creation of new green	Noted: Consider comments in the development the policy and future iteration of the Plan.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>corridors and habitats for new legislative measures. In addition, it would also be beneficial to include the provision of a buffer of 8 to 20 meters of undeveloped land (e.g. grassland or woodland) between the boundary of new development and the water environment. This would further help maintain the connectivity for species along the riparian corridor, and help protect the watercourse from being over-managed. This section should also seek opportunities for and promote tree planting alongside rivers. Trees are important in helping to keep rivers cool and therefore improving the state of the river for biodiversity. By providing shade, trees are able to moderate the extremes in water temperature which can be detrimental to fish spawning. Their underwater root systems provide valuable habitat to fish and invertebrates whilst stabilising the banks. Shading can also be helpful in the control of aquatic vegetation and well as bringing benefits for people. In addition, shading can help combat blue-green algae. Paragraph 8.23 We fully support the use of Ecological network mapping and linking existing priority habitats as identified in the Norfolk BAP. We support the prioritising of enhancement and expansion of existing resources as well as re-connecting habitats where they have been destroyed.</p>	
ENV4	Natural England (1215824)	LP720	General Comments	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Protection afforded to designated sites and the commitment to a strategic approach to mitigate recreational visitor impacts to European site is welcomed. Developmental growth in the area is likely to cause adverse effects to designated sites and should be appropriately assessed to identify impacts and mitigation, resulting in the delivery of a costed suite of measures. We understand that a report to facilitate a Norfolk Wide Green Infrastructure and Recreation Management Strategy is currently being researched and drafted. The strategy should be assessed to determine the suitability in mitigating the effects of increased recreational disturbance to North Norfolk’s designated sites as a result of strategic growth. The effects of growth on other statutorily designated sites, including Sites of Special Scientific Interest (SSSIs), should also be assessed and measures to address adverse impacts identified, applying the mitigation hierarchy in accordance with paragraph 175 of the NPPF. We support the recommendation to split Policy ENV 4 to cover designated and non-</p>	Noted. Consider feedback in the development of this policy and monitoring requirements. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>designated biodiversity assets at later iterations of the Plan and HRA. We strongly advise the Local Planning Authority instigates a suitably proportionate interim payment per dwelling in the absence of an established strategy to ensure new residential development and any associated recreational disturbance impacts on European designated sites are compliant with the Habitats Regulations, to address cumulative and in-combination impacts arising. We value the enhancement of biodiversity and geodiversity and the opportunity to create/improve habitats to support wildlife through biodiversity net gain. We encourage links to existing ecological networks to reduce fragmentation and facilitate wildlife movement on a strategic scale. The Local Planning Authority should develop an evidence base around biodiversity net gain that includes mapping assets and opportunities for habitat creation. Calculating biodiversity net gains and losses requires access to good data such as a phase 1 habitats survey that includes habitat condition. Where risks cannot be avoided or mitigated onsite, compensation may be required offsite for residual losses to achieve a biodiversity net gain outcome. In these cases, access to up to date ecological baseline data about any offset receptor site(s) will be needed. The mechanism of delivery should also be considered including the application of a metric to secure a net gain of biodiversity. We recommend CIRIA/CIEEM/IEMA 10 good practice principles when applying biodiversity net gain approaches. The approach to net gain should be monitored and reviewed. • Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver. The Plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p>	
ENV4	Norfolk County Council (931093)	LP739	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: para 8.22 ‘A development with limited or no impacts on biodiversity should still seek to demonstrate a biodiversity net gain wherever possible. Remove ‘wherever possible’ – the word should already indicates it is optional. Where ever possible does not add anything to the sentence. Include ‘measurable’ net gain – so that</p>	Noted:- Consider comments in the finalisation of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>we can record/request quantitative data on the loss and gains. Biodiversity net gain comes from 'enhancement' i.e. 'restoring habitats not affected by construction – for example, an area of ancient woodland that is in poor condition'. The other, more common meaning of 'enhancement' is 'providing environmental benefits over and above the measures required for mitigation'. Such enhancements do not constitute mitigation or compensation. Mitigation is carried out to limit and compensate for impacts, prior to any enhancement. (four steps of the mitigation hierarchy – avoid, minimize, restore and offset). Avoiding/protecting hedgerows, ponds etc. is mitigation, not net-gain. Creating an additional pond, woodland is net gain. - Recommendation: we would strongly recommend that text to the effect that 'enhancement and mitigation measures should, where available, be evidence based' is included. There is a wide range of published information available relating to mitigation and conservation strategies that must be incorporated into strategies to maximise chances of success. Para 8.23 Recommendations: Please remove references to the Norfolk Biodiversity Action Plans (BAPs). BAPs ceased to exist in 2012 with the publication of Biodiversity 2020: A strategy for England's wildlife and ecosystem service. You might want to add a footer along the lines of 'Priority habitats and species refer to those identified as being of principal importance in England, in Section 1 of the Natural Environment and Rural Communities Act 2006'. Comment: Soprano pipistrelle bats were identified as a UKBAP, but they are very common throughout Norfolk, so might not be a species requiring targeted conservation action. Other bat species would be a higher priority.- para 8.25 Replace ..."and replacement habitats may need to be provided to ensure no net loss of important habitats with '... and replacement habitats may need to be provided to ensure no net loss of important habitats.' - specific to the policy wording On the 13th March, in the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the word 'should'. Recommendation: After '...ecological function' add 'and ecosystem services'. Bullet 2 add 'habitat and ecosystem functions'. Bullet 3 On the 13th March, in</p>	

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>the Spring Statement, the Government confirmed that new developments must deliver an overall increase in biodiversity. https://deframedia.blog.gov.uk/2019/03/13/government-to-mandate-biodiversity-net-gain/ we would therefore suggest removal of the words 'where appropriate. Plus replace wildlife homes with Nests and roosts. Remove also where ever possible from third para. footnote 56 Remove reference to Norfolk Biodiversity Action Plans as per previous comment. Could reference Section 1 of the Natural Environment and Rural Communities Act 2006. - second part of the policy should be updated in line with: Proposals whose principal objective to conserve /enhance biodiversity or geodiversity interests should not be given planning if it will result in significant detriment to nature conservation interests. I would suggest re-ordering the sentences: Development proposals where the principal objective is to conserve (add in) and/or enhance biodiversity or geodiversity interests will be supported in principle, unless Development proposals that would result in significant detriment to the nature conservation interests of nationally designated (and internationally designated?) sites will not be permitted. However, if proposals that would otherwise be granted as their principal objective is to conserve and/or enhance biodiversity will have a significant detriment to the nature conservation interests of nationally designated sites, they will not be permitted. Last para re proposal for an Ecological environmental impact assessment ...and PEA...A PEA refers to the survey of the site. The result of the survey(s) are presented in a PEAR (Preliminary Ecological Appraisal Report) or EclA (Ecological Impact Assessment). A PEA cannot be submitted as it is not a report, just the survey. Recommendation: add in '...to assess effects on all sites of nature conservation value..' PEAs should be undertaken at all sites of conservation value, not just for European Sites.</p>	
ENV4	Gladman Developments, Mr Craig Barnes (1217131)	LP282	General Comments	Gladman largely support the requirements of Policy ENV4 which seeks to protect, support and enhance biodiversity. Gladman consider that the overall thrust of the Policy is consistent with the aims of the NPPF for sustainable development which seeks to secure net gains for the environment. The policy is sufficiently flexible providing opportunity for mitigation where direct or indirect	Noted, Support welcomed - disagree (partly): Evidence contained within the emerging Recreation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>adverse effects on designated sites are unavoidable. Proposed changes: To ensure that requested contributions required by the policy to address visitor impact on European Sites is consistent with national policy on planning obligations, Gladman consider that the policy should be reworded to make clear that the contribution required should be linked to the proposed development and the increased usage of these sites which is associated with the development.</p>	<p>avoidance and mitigation Strategy and in line with advice from natural England will be used to inform future iterations of the Plan and address impacts on European Sites</p>
ENV4	CPRE (Mr Michael Rayner) (1204056)	LP299	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Therefore, greater recognition needs to be given to the role of rivers and the land around them in policy ENV 4. In our view rivers and the land around them are the most important features in considering the ecological network, and the network is the best hope for protecting and enhancing individual species, the habitats they need, and the room to adjust and survive. Our concerns arise from a generalised text which makes no mention of rivers at all, far less the importance of those in North Norfolk; and the overlay throughout of setting biodiversity activities solely through the prism of development and net environmental gain. See paragraph 8.21 in the draft as setting the scene: In 2018 the Government indicated that they intend to require developers how they are improving the biodiversity of a site, to deliver a biodiversity net gain. This is part of an ambition to embed the wider principle of environmental net gain in development. While this can be provide some opportunities it cannot, and need not, stand alone, as implied by the draft support text and policy. The developer will start with the development they want, and then see what can be bolted on in terms of biodiversity and net gain; and in the same way land for a new school or some other community benefit. This is different approach from starting from biodiversity as the core aim in the context of a wider long term strategy and its implementation. Much of has comes from NGO s. This is missing now in the draft, but was and is present in</p>	<p>Noted Consider comments in the finalisation of the policy</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>the Core Strategy. We add a footnote on advances over the past ten years, and hope that may be helpful in considering our proposals in providing illustrative draft texts, should you accept in principle the points we make. ..Proposal for EN 4 policy text. This starts with three points under the heading of “All development proposals should”: We suggest the addition of a fourth point, namely: 4. In addition to the above the Council will promote and engage with the contribution to be initiated and implemented by NGOs in the enhancement of biodiversity, both in terms of longer term biodiversity strategies and priorities for the District and their delivery. These aims will also support the assessment and value of the net gains offered by a developer in support of determination of their application. This includes potential contributions which would support the ecological network..</p>	
ENV4	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP507	Support	Support	Support welcomed
ENV4	Norfolk Wildlife Trust (1217447)	LP692, LP693	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: We support the principle of this section but the wording needs changing to ensure it complies with the Plan Vision. In order to ensure the plan vision of conserving and enhancing Norfolk’s distinctive and bio diverse environments is achieved, we strongly recommend that the wording here is changed from should to will, so that the end of the paragraph reads I.e. ‘development proposals will deliver net gains in biodiversity’. The policy wording needs to demonstrate that Biodiversity Net Gain (BNG) will be mandatory and expected (proportionally) from all development. In the proposed methods set out in the recent DEFRA consultation, the requirement to deliver net gain is proportional to the scale of the development, so we do not regard there as being any particular threshold below which this proposal should not apply. Where BNG is not achievable on site, in particular on small sites or where there is a need to maximise the use of the developable area, then a mechanism to allow contributions pooled towards off-site BNG should be provided. In addition, any BNG should be measurable, in line with the terminology used in best practice (see recent guidance issued by</p>	Support noted- consider strengthening the wording of policy ENV 4 to deliver biodiversity net gains. Consider a standalone policy in regard visitor pressure impacts on European Sites as recommended in the HRA. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and this policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>CIEEM), in order to demonstrate that BNG and allow for monitoring of progress towards the Vision, Aims & Objectives of the plan. We support the inclusion of requirements for wildlife homes in new development, such as swift and bat boxes, which will help integrate wildlife into new development, providing people with more opportunities to encounter wildlife on a daily basis, improving their quality of life, as well as making new development more permeable and less of a barrier to wildlife movement. We support the commitment to developer contributions regarding visitor impacts from new development on European sites and support the recommendations in the accompanying HRA regarding the incorporation of the developing county-wide Recreational Impact Avoidance & Mitigation Strategy into the next draft of the local plan. We also support the recommendation made in the HRA for the separation of this element out into a separate policy, for clarity. Proposed Changes: In order to ensure the plan vision of conserving and enhancing Norfolk's distinctive and bio diverse environments is achieved, we strongly recommend that the wording here is changed from should to will, so that the end of the paragraph reads i.e. 'development proposals will deliver net gains in biodiversity'. We recommend that in the second paragraph, the text is changed from 'biodiversity net gains and contribution to ecological networks should be sought' is changed to 'measurable biodiversity net gains and contribution to ecological networks will be sought' in order to provide consistent application of the policy and avoid any ambiguity. We also recommend that the treatment of visitor pressure impacts on European Sites is placed into a separate policy for clarity, as recommended in the HRA.</p>	<p>area in relation to European Sites</p>
ENV4	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports the need for protecting biodiversity and creating net-gain in new development through restoration and enhancement measures. As with Policy ENV2, Policy ENV4 should be clear in protecting biodiversity and should pursue opportunities for biodiversity net-gain as per NPPF paragraph 174. It should have sufficient flexibility so as not to limit development where constraints can be managed and addressed through an appropriate design solution. This will ensure the policy is effective and consistent with NPPF paragraphs 174-177.</p>	<p>Support noted. Consider comments in the development of the policy.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV4	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP316	Object	<p>Policy ENV4 states that: “Developer contributions will be required to ensure that visitor impact mitigation on European sites from additional pressure on Natura 2000 sites is in line with the emerging Recreational Impact Avoidance & Mitigation Strategy for recreational impacts on those sensitive sites.” We ask to what extent will that Strategy be subjected to appropriate public scrutiny and examination, including the justification/viability in asking for financial contributions from applicants? We raise this point as hitherto - via a somewhat nebulous provision in Site Allocations policies of the current Plan - developers have been asked for £50 per dwelling towards mitigation, without any apparent critical/assessment basis for the principle or value of the contribution sought. Seek clarification on developer contribution/mitigation measures</p>	<p>The council is working jointly across Norfolk authorities and with Natural England to develop an evidence base to inform local plans to ensure that residential planning applications which have the potential to impact on European designated sites are compliant with Habitats Regulations and a strategic solution to deliver mitigation necessary to avoid the likely significant effects from in-combination impacts of residential development that is forecast across Norfolk. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan</p>

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV4)
Objection	1	<p>The approach was largely supported, with statutory bodies requesting some clarifications around background documents and sought stronger wording around the requirement to provide enhanced biodiversity and habitat creation on and off site, thus better linking the policy to the Plans Vision. Wording such as "wherever possible, where appropriate" should be removed. The adoption of a strategic approach to mitigate recreational visitor impacts to European sites was welcomed by Natural England and should be set out further in the policy following finalisation of the joint Norfolk study. A monitoring strategy should be developed in order to measure biodiversity net gain over the Plan period. Greater recognition around the contribution and opportunities rivers provide in ecological network was also sought. Developers largely supported the approach as being consistent with the NPPF and providing flexibility so as not to limit development where constraints can be managed and addressed through appropriate design and mitigation, but suggested that in places it could be more prescriptive around the planning obligations, seeking also to limit and Es contribution to be site specific.</p>
Support	5	
General Comments	4	

Alternatives

ENV4	Mr & Mrs Johnson (1215700)	AC028	Support	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY:</p> <p>Partially Supports Assessment ENV4. - Norfolk is generally agricultural. The intensive nature of farming can have a negative impact on biodiversity and habitat if hedgerows are removed, field margins are planted, and insecticides are used. Developing land currently used for farming would have less impact environmentally and on biodiversity than the development of woodland, pasture land or dormant farmland .The development of land that currently provides biodiversity and its associated beneficial effects should be avoided</p>	<p>Comments noted: This comment repeats the support ENV4 made against the First Draft Local Plan (Part 1).</p>
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Late Representation

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments	Council's Response
ENV4	Norfolk Geodiversity Partnership	N/A	General comments	OFFICER SUMMARY: The Norfolk Geodiversity Partnership (NGP) is working to conserve geodiversity outside the SSSI network and is responsible for	Comments noted: consider comments in

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments	Council's Response
				<p>designation of Local Sites of geodiversity interest in Norfolk. These include County Geodiversity Sites (CGS) and candidate CGS.</p> <p>NGP request inclusion of wording within the policy justification at 8.20 regarding Local Sites, in relation to biodiversity and geology including 'international, nationally and locally designated sites' and at 8.3 adding '2 County Geodiversity Sites (CGS) and 42 candidate CGS.' Also request amendment to para 8.24 to include that the '<i>NBIS also distributes data about Local Sites of geodiversity importance and further information about them is available from the Norfolk Geodiversity Partnership.</i>' Commenting that as mentioned in footnote 55 the term</p> <p>'Regionally Important Geological Sites' is no longer in wide usage and is best replaced by 'Local Sites' which comprise both biodiversity and geodiversity sites. CGS and CWS are the Norfolk versions of this Local Sites category.</p>	the development of the policy.

Policy ENV5 - Green Infrastructure

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	Woodward, Mrs Josephine (1217427)	LP605	General Comments	Provision is to be made for the enhancement of green infrastructure and a clear definition of the provision of green infrastructure.
ENV5	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: NNDC must work to lower the carbon costs of transport. It should support developing safe for pedestrians and cyclists, and cleaner buses, and delivery vehicles of all sorts. It could provide a fleet of cleaner cars for its own staff to use on council business. It could lobby for lower road speeds.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. See comments. Green infrastructure should be considered in terms of its overall contribution as wildlife corridors and prevent isolation of green areas in order to encourage biodiversity.
ENV5	Watson, Mr Martin (1215724)	LP118	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Many holiday-makers as well as local citizens want to enjoy the beauty of the North Norfolk countryside, keeping healthy by walking and cycling. The problem is that many of the roads that lead through the countryside are narrow and pose dangers to cyclists. There may be safe riding opportunities in campsites and caravan parks but on the open road there are many places where families cycling with children run real risks from motorised traffic. Not having safe cycling paths or tracks discourages holiday-makers with families from coming here as well as the local population from keeping fit on their bicycles. Re aims to: 'facilitate increased cycling': discrete cycle paths and tracks are needed. I would suggest that particular areas of danger are identified and efforts made to eradicate the danger. An example is: the road from Weybourne to Holt. The whole road is narrow but the main danger is at the top of the hill. There the road bends to the left as it flattens out but the sides are steep banks and do not allow a cyclist to leave the road if a large vehicle is approaching at the same time. Children especially are at risk. There are many such examples in our area which could be made safe if cycle paths were available off the roads. Cycle tracks are required. Areas of danger for cyclists should be identified and efforts made to eradicate the danger.
ENV5	Mr Phillip Duncan (1217309)	LP401 LP402 LP405	Object	Proposed Policy ENV5 and the Green Infrastructure Background Paper 5 The Draft Plan makes clear (paras 8.27 and 8.29) that the policy is informed by the Green Infrastructure Background Paper 5. However the Paper simply states that “Land allocations in Cromer seek to provide 600 homes and are outlined below” The principles offered in the GI paper are only in relation to those selected sites - The starting point for consideration of GI appears only to begin on the assumption that the sites considered are the best, not that a GI assessment is offered to inform site selection as set out in the Draft LP. This is therefore inconsistent. The approach in the GI paper appears inconsistent with the role of a Local Plan – it is suggested in regard to Cromer that “some of the formal sports pitches in the town could be considered at the threat of development as they are potentially attractive development plots within the settlement boundary” (p.13). One of the roles of the Local Plan is enabling retention of such valuable facilities – as is demonstrated in Policies SD6 and ENV7. The GI paper as an informing document appears inconsistent.
ENV5	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Cycle paths, electric public transport, green spaces for outdoor leisure need to be a part of every built area. This must be as great a priority as built space. Present constructions provide little in the way of wild space.

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV5	North Norfolk District Council Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Vital to the health and wellbeing of the people of the District. We welcome the GI Position Statement and the GI plan for North Walsham which is contained within it, stipulates a requirement for walking and cycling paths, green corridors for wildlife and extended provision for woodland. Makes no direct reference either to Pigney’s Wood or to the reclamation of the Dilham Canal. These are vital resources for the health and wellbeing of our town and they deserve to be incorporated within a strong GI plan linking any town extension to the town centre and countryside. We welcome mention of connectivity as without this the policy will not be helpful either to people or wildlife. We would like to see that there is rigorous testing of any assertion that green infrastructure cannot be delivered on a proposed site. If after such testing this can be demonstrated, then enhancement and mitigation must be delivered as close to the development site as possible.

Individuals	Number Received	Summary of Responses (Policy ENV5)
Summary of Objections	5	Five objections: suggest that NNDC should lower the carbon costs of transport, provide safe pedestrian and cycle routes, encourage electric public transport and ensure that green spaces are provided for outdoor leisure as part of every built area. One objection raises concern over inconsistencies with this policy and the GI Background Paper.
Summary of Supports	2	Two support this policy and were in agreement that GI should be considered in terms of its overall contribution as wildlife corridors and prevent isolated green areas in order to encourage biodiversity. Cycle paths are needed to allow and encourage holiday makers and residents to enjoy the countryside walking or cycling. Roads are considered narrow and dangerous for cyclists.
Summary of General Comments	2	Two general comments received. GI is vital to health and wellbeing of the people in the District. Welcomes GI plan for North Walsham but makes no direct reference to Pigney's wood or Dilham Canal. Welcome more rigorous testing of whether GI can be provided, otherwise should be delivered close to the development. Suggests that a clear definition of the provision of green infrastructure is required.
Overall Summary		No substantial issues raised. Most comments highlighted the importance of GI for the health and wellbeing for residents. A number suggest that NNDC should lower the carbon costs of transport encouraging electric public transport and improve walking and cycle routes. Others suggest that green spaces should be provided as part of every built area and to prevent isolation of green areas in order to encourage biodiversity and to contribute as wildlife corridors. One seeks clarification of what green infrastructure is required.

Council's Response	Noted: agree, The plan positively promotes the provision of high quality on site GI and enhancement and improvement of the existing strategic network. Evidence contained within the North Norfolk Open Space and Sport Recreation a study will be used to inform future site specific requirements.
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Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV5	Cromer Town Council (1218420)	LP732	General Comments	<p>OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More houses means more traffic movement to and from the houses including for example the collection and disposal of waste. Cromer is already a congestion hot spot.</p> <ul style="list-style-type: none"> • Consideration is required in respect of public transport for people who cannot afford to live in Cromer and have to commute to the town. • Cycleways should be included as part of allocations. It is noted that improvements to the existing cycle routes are not proposed as part of the infrastructure position statement, and this could be a useful addition. • Details and referenced documents indicate that areas in and around Cromer make a significant contribution towards congestion “hot-spots”, though no ongoing actions are proposed to mitigate this in view of further major development. We feel an individual traffic and transport study is a requirement in Cromer to help identify means of mitigating against current congestion and other transport pressures. Footpaths • Northrepps FP16 – There is concern at the impact on biodiversity if this footpath is extended to Roughton Road 	Noted: NCC highways have informed the identification of site options. The impact of traffic generation and cumulative effects have been taken into consideration in setting the distribution and housing numbers. Support for on-site and off-site improvements and improved connectivity for green infrastructure is welcomed. Further requirements are detailed in the Green Infrastructure position statement and policy ENV5.
ENV5	Sheringham Town Council (1217426)	LP548	Support	STC agrees with the proposed policy but would like to see the policy strengthened, particularly with regard to linking green areas and open spaces.	Supported welcomed. Consider comments in the development the policy.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV5)
Objection	0	General support expressed but policy strengthening could be provided around provision of cycleway and linkage between existing open spaces.
Support	1	
General Comments	1	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV5	Natural England (1215824)	LP721	General Comments	GI is central to the planning process and policy points should include requirement for monitoring and evaluation of new GI especially in the case of habitat creation. We welcome the safeguarding and provision of Green Infrastructure delivered through Policy ENV 5. We agree that all development should include GI principals and deliver proportionate requirements. We recommend the Green Infrastructure Partnership as a useful source of information when creating and enhancing GI.	Noted
ENV5	Norfolk County Council (931093)	LP739	General Comments	Could additionally make reference to the Public Rights of Way network as a location for offsite enhancement where required	Noted:- Consider comments in the finalisation of the policy
ENV5	Gladman Developments, Mr Craig Barnes (1217131)	LP283	Support	The role of Green Infrastructure in supporting health and wellbeing of residents, together with the benefits for wildlife is recognised by Gladman. As such, Gladman always promotes sites which provides substantial amounts of high-quality green infrastructure, and which can connect to and complement existing green infrastructure. Gladman therefore broadly support the aims of this policy. Given its role within the policy, the Council will need to ensure that the Green Infrastructure Background Paper is made available and continues to be made available following adoption of the Local Plan. The Council should	Noted: support welcomed - Disagree (partly) - Consider comments in the development the policy and the finalisation of the approach to GI. Background paper no 5

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				ensure that this evidence is kept up-to-date through future reviews of the Local Plan. Care should be taken by the Council in setting the language for the policy. The policy requires a detailed scheme setting out the Green Infrastructure provision for a development, however this wording does not account for the fact that some developments will be promoted as outline applications initially, where matters of scale, layout and landscape will often be offset to be determined at the reserved matters stage. Proposed changes: The policy should be reworded to account for this, requiring only sufficient information at the outline application stage to allow for decision makers to determine that the proposed development is capable or responding to Policy ENV5 at the detailed application stage.	Green Infrastructure was published as supporting information at the time of the consultation
ENV5	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP508	Support	Policy ENV 5 – We support but there needs to be monitoring in place to ensure this is carried out	Consider comments in the finalisation of the policy and monitoring Framework
ENV5	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Encourages the provision of green infrastructure and recognises it can enhance individual developments as well as having a cumulative positive impact across the District. The policy should be formulated in such a way to ensure that green infrastructure provision on individual sites should however be proportionate and appropriate to the scale of development and should not overburden developer at the expense of other aspects of sustainable development. This will ensure individual developments remain viable and that the policy is effective and consistent national policy (NPPF paragraph 34).	Support noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV5)
Objection	0	
Support	3	

General Comments	2	The approach of providing GI and its role in wider benefits both health and environmental was recognised and the policy aims supported. A monitoring strategy should be developed and further requirements around GI improvements set out in a background paper.
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Alternatives

ENV5	Mr & Mrs Johnson (1215700)	AC029	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV5. - Green infrastructure should be considered in terms of its overall contribution as wildlife corridors and prevent isolation of green areas in order to encourage biodiversity.	Comments noted: This comment repeats the support ENV5 made against the First Draft Local Plan (Part 1).
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Policy ENV6 - Trees & Hedgerows

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV6	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. This is absolutely necessary to prevent the erosion of biodiversity, and to provide a network of wildlife habitat across the county and not just isolated areas. See comments on ENV1. As many trees, hedgerows, coppices, ponds and mature areas of woodland as possible should be retained. On any developed land trees and hedges should be retained and protected by planning conditions wherever possible.
ENV6	Rose, Mr Alan (1217227)	LP580	General Comments	OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Planting trees with new builds is also really important for the environment.

Individuals	Number Received	Summary of Responses (Policy ENV6)
Summary of Objections	0	None received

Summary of Supports	1	One supports this policy, to encourage the retention of biodiversity, to provide a network of wildlife habitat across the county and not just isolated areas
Summary of General Comments	1	One general comment received. Tree planting should be encouraged.
Overall Summary		Limited comments received and no substantive issues identified. The policy was supported and considered necessary to prevent the erosion of biodiversity and to provide network of habitat across the county. Tree planting should be encouraged.
Council's Response		Noted.

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV6	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV6)
Objection	0	No comments received.
Support	0	
General Comments	0	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV6	Environment Agency (1217223)	LP465	General Comments	Policy ENV 6 – Trees and Hedgerows Opportunities for tree planting alongside rivers should be promoted. Riparian tree cover helps shade the river and keep water temperature cool in the summer. This can help reduce the effects of climate change and could become increasingly important as summer temperatures rise. Riverside tree roots also provide important refuge for fish fry and aquatic invertebrates, as well as mammals and bird species.	Noted: Consider comments in the development the policy.
ENV6	Norfolk County Council (931093)	LP739	Support	We support this policy protect trees and hedgerow that are already afforded a certain level of protection. We would also encourage the addition of wording to encourage development to protect and retain trees and hedgerows that whilst may not have protection, are still considered important landscape and or biodiversity features.	Noted:- Consider comments in the finalisation of the policy
ENV6	Gladman Developments, Mr Craig Barnes (1217131)	LP284	General Comments	It is always the intention of Gladman to retain existing trees and hedgerows within developments as far as possible. The retention of trees and hedgerows is beneficial for the desirability of the development as a place to live and also benefits wildlife by providing corridors through the Site. It is not always possible to avoid every tree and all hedgerows within a development, such is the need for access, drainage requirements and the need to make best use of the site. It is therefore important that the Policy is sufficiently flexibility to allow for mitigation to ensure that otherwise sustainable developments can take place. Whilst acknowledged that the Policy is connected to valued and high-quality tree/hedgerows, it is unclear to Gladman what the Council would consider to be “public benefit” which is required by the Policy to prevent a refusal. It is unclear for example whether the role of the Site in meeting the objectively assessed needs of the authority is considered sufficient to meet the definition of “public benefit”. Proposed changes: The Council should clarify what is meant by "public benefit" in the context of this policy, as this could be particularly important should any allocated sites be affected by the trees/hedgerows sought for protection in this policy, where the loss is unavoidable.	Noted: support welcomed Consider clarification around public benefits in the finalisation of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV6	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP509, LP510	Support	Support	Support welcomed

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV6)
Objection	0	The approach was supported, further clarity could be provided around the meaning of "public benefit" and the retention of trees that are important to the landscape/ biodiversity.
Support	2	
General Comments	2	

Alternatives

ENV6	Mr & Mrs Johnson (1215700)	AC030	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV6. - This is absolutely necessary to prevent the erosion of biodiversity, and to provide a network of wildlife habitat across the county and not just isolated areas. See comments on ENV1. As many trees, hedgerows, coppices, ponds and mature areas of woodland as possible should be retained. On any developed land trees and hedges should be retained and protected by planning conditions wherever possible.	Comments noted: This comment repeats the support ENV6 made against the First Draft Local Plan (Part 1).
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Policy ENV8 - Public Rights of Way

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV8	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP260	Object	Policy ENV 8 states that; 'New development should create convenient attractive links with development and to the surrounding areas, assist with creation and a network of accessible green space and provide links to public transport and walking and cycling networks.' A public footpath (Roughton FP15) lies along the eastern boundary of Land east of Norwich Road. The indicative masterplan, which is submitted in support of these representations, demonstrates how a link will be provided from the site onto the footpath, creating a highly permeable development which can be fully accessed by pedestrians, and providing a pedestrian link to the village and the church.
ENV8	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Agree. Recent issues surrounding access to the coast as a result of some national policy have caused concern. There are issues regarding access in certain areas of wildlife habitat and disturbance by inappropriate behaviour, noise and dogs. Organisations such as National Trust and NWT try to strike a balance between access for all at certain times of year and restricted access at other times to prevent wildlife disturbance or habitat erosion, especially where endangered species are concerned. Consultation with these and other experienced organisations or bodies is essential in developing a policy.

Individuals	Number Received	Summary of Responses (Policy ENV8)
Summary of Objections	1	One objection received. Promoting a site in Roughton, that could provide links from the site to footpath (Roughton FP15) providing a highly permeable development fully accessible by pedestrians to the village and church.
Summary of Supports	1	One supports this policy, but also raises concerns over the potential impact on certain areas of wildlife from disturbance by inappropriate behaviour, noise and dogs. And suggests that consultation with National Trust and other experienced organisations is essential.
Summary of General Comments	0	None received

Overall Summary		Generally supportive of policy, but also raise concerns over the potential impact on certain areas of wildlife habitat from disturbance by inappropriate behaviour, noise and dogs. Consultation with National Trust and other experienced organisations is essential.
Council's Response		Noted: agree, The plan positively promotes the provision of high quality on site GI and enhancement and improvement of the existing strategic network including public rights of way. Evidence contained within the emerging RAMs strategy will inform future iterations of the Plan and provided enhanced mitigation measures through partnership work.

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV8	Cley Parish Council (1217592)	LP647	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Cley Parish Council fully support the PROW proposals in the Local Plan. In particular Cley would like to see better connectivity for Public Rights of Way, using permissive paths, footways and new PROW where ever possible to connect and link to adjoining parishes, National Trails and local services. All new development should enhance the current PROW network whilst creating new off road opportunities for walkers, cyclists and horse riders.	Support Noted

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV8)
Objection	0	Support for increased connectivity through connection of public right of ways.
Support	1	
General Comments	0	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV8	Natural England (1215824)	LP723	Support	We appreciate the protection and enhancement of Public Rights of Way and the creation of additional footpath networks and accessible green space through Policy ENV 8.	Supported welcomed
ENV8	Norfolk County Council (931093)	LP739	Support	Policy could make reference to the importance and opportunity of accommodating Public Rights of Way within developments. It should also be noted that developments should contribute towards infrastructure improvements where there will be increased footfall on public rights of way adjacent to the development	Noted:- Consider comments in the finalisation of the policy
ENV8	Norfolk Local Access Forum, Mr David Hissey (1217490 & 1217491)	LP639	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The Norfolk Local Access Forum agree with the environment policies, including Policy ENV8 - Public Rights of Way (PRoW) and request that the Forum is consulted about any planning application that involves a PRoW.	Noted.
ENV8 ENV9?	Norfolk Police (1217249)	LP734	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Request the heading Safety be replaced with Security • 'In town centres covered by CCTV systems, developers will be required to consider these facilities in their design and/or contribute to the siting/re-siting of cameras where appropriate'. This sentence appears connected to SBD/Norfolk Constabulary, suggest extra line for clarity. 8.73 – PARKING (pg 106) • No reference to security which is integral to its functionality – request wording 'secure or safe' to be incorporated.	Noted- consider inclusion of the additional wording proposed through the preparation of the policy.
ENV8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV8 aims to protect and enhance public rights of way (PROW) and encourage well connected, permeable development. This is through new development creating convenient and attractive links to surrounding areas, connecting to walking, cycling and public transport networks. This is conducive to good, sustainable urban design and placemaking which aligns with the Duchy of Cornwall's development principles. Any	Support noted. Consider comments in the finalisation of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				requirement for a developer to improve a PROW as part of a development scheme should be proportionate, necessary to make the development acceptable, and should not overly burden the developer to ensure it remains deliverable. This will ensure the policy is effective and consistent with national policy. Policy DS7 states that improvements to a PROW are a site-specific requirement. This is questioned given in our comments to Policy DS7 given the site's distance from Rudham Stile Lane.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV8)
Objection	1 0	The approach was largely endorsed by those that responded. In finalising the policy it was suggested further commentary on the inclusion of public right of way and the opportunities for development to provide proportionate improvements to PROWs.
Support	3	
General Comments	1	

Alternatives

ENV8	Mr & Mrs Johnson (1215700)	AC032	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports Assessment ENV8. - Recent issues surrounding access to the coast as a result of some national policy have caused concern. There are issues regarding access in certain areas of wildlife habitat and disturbance by inappropriate behaviour, noise and dogs. Organisations such as National Trust and NWT try to strike a balance between access for all at certain times of year and restricted access at other times to prevent wildlife disturbance or habitat erosion, especially where endangered species are concerned. Consultation with these and other experienced organisations or bodies is essential in developing a policy.	Comments noted: This comment repeats the support ENV8 made against the First Draft Local Plan (Part 1).
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Policy ENV9 – High Quality Design

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV9	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Agree. See comments Larger properties and/or second homes built by individuals along the NN coast on infill sites are in many cases very poorly conceived and detailed, use inappropriate materials, are of unsympathetic character, too large and in no way serve to enhance the character or appearance of the area. We would welcome a policy to prevent the proliferation of such unsympathetic development.
ENV9	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Problem occurs with owners of larger gardens selling off part of the garden for development. In many cases this alters the character of the village / town by gradual urbanisation and constitutes a loss of green space / habitat and would contravene several of the ENV policies. We would like to think that this policy would prevent the proliferation of unsympathetic development.
ENV9	Cuthbert, Mr Andrew (1218313)	LP702	Object	When planning a village development, thought must be given to where vehicles are to be parked. In this modern age garages are an unnecessary extra building cost BUT off-the-road space for two vehicles per dwelling must be allowed for. ~More attention to detail by District Planners should be given to make sure developers use traditional material , skills and design commensurate with the local surroundings whether they are in an area of outstanding natural beauty or just plain North Norfolk.
ENV9	Drury, Mrs Margaret (1210793)	LP086	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: I am not against innovative design, we have enough Norfolk Homes identikit houses. These measures will put up the cost but the climate demands it and incomers from other areas often sell property for way above the cost of houses here.
ENV9	Rayner, Mr Andrew (1217466)	LP635	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Build quality:- I hope the design and build of any new homes will be carefully considered as most developers seem to have a design identikit which does not include the local vernacular. They should all exceed current sustainability targets. Any design guidance should be enforceable.
ENV9	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: This policy is essential to North Norfolk District Council's proposals for North Walsham and we have drawn attention to this in our introductory comments. We appreciate that this policy demonstrates the way in which it is not simply one policy but a collection of policies which is required to support a well designed development. We would not like to see any weakening of this draft policy.

Individuals	Number Received	Summary of Responses (Policy ENV9)
Summary of Objections	2	Two objections received. Design of buildings should be of traditional material, skills and design in keeping with the location whether in the AONB or not. Developers seem to have a design identikit. Consideration should be given to car parking on developments in villages; garages are unnecessary but off-the-road space for two vehicles per dwelling must be allowed for. Development should exceed current sustainability targets and design guidance should be enforceable.
Summary of Supports	2	Two support this policy. There is concern expressed about newly built infill dwellings along the coast and about the loss of residential gardens to development.
Summary of General Comments	2	Two general comment received, these measure will put up the cost of houses but is needed. Important for North Walsham - would not like to see any weakening of this draft policy.

Overall Summary		No substantial comments received or issues raised. There is support for a strong design policy. Some consider that design of buildings should be of traditional material, skills and design in keeping with the location whether in the AONB or not and concern that developers seem to have a design identikit. Consideration should be given to car parking on developments in villages; garages are unnecessary but off-the-road space for two vehicles per dwelling must be allowed for. Development should exceed current sustainability targets and design guidance should be enforceable. There is concern expressed about newly built infill dwellings along the coast and about the loss of residential gardens to development.
Council's Response		Comments noted. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk. In conjunction with the emerging Design guide SPD, the purpose of this policy is to provide a set of design principles which when followed will result in improved design and ensure the special character and qualities of North Norfolk are maintained and enhanced.

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV9	N/A	N/A	N/A	No comments received.	N/A

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV9)
Objection	0	No comments received.
Support	0	
General Comments	0	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Environment Agency (1217223)	LP466	General Comments	Policy ENV 6 – Trees and Hedgerows Opportunities for tree planting alongside rivers should be promoted. Riparian tree cover helps shade the river and keep water temperature cool in the summer. This can help reduce the effects of climate change and could become increasingly important as summer temperatures rise. Riverside tree roots also provide important refuge for fish fry and aquatic invertebrates, as well as mammals and bird species.	Noted: Consider comments in the development the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Gladman Developments, Mr Craig Barnes (1217131)	LP286	Support	Gladman is in broad support of this Policy. The NPPF places significant weight on the need to secure well designed, high quality development. The implementation of this Policy will help secure this. Notwithstanding this, there is a need for the approach of the Policy to be adjusted to reflect the scale and type of development which will come forward over the plan period, and a recognition of the different approach that will be taken by applicants to secure planning permission. At present the policy applies in full towards all development proposals. As such the policy is inflexible as it fails to recognise that not all developments will be capable, by way of their type, scale, form and location or even the type of planning application submitted (for example an outline planning application), of responding to the requirements of the North Norfolk Design Guide or policy criteria. Proposed changes: Mindful of this, Gladman consider that the policy needs to be reworded to set out that the North Norfolk Design Guide/policy criteria apply “where relevant”.	Comments noted. Disagree: Design principles should be considered from the outset. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk. In conjunction with the emerging Design guide SPD, the purpose of this policy is to provide a set of design principles which when followed will result in improved design and ensure the special character and qualities of North Norfolk are maintained and enhanced.
ENV9	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP512, 513,514	General Comments	8.57 West Norfolk has a Design Panel made up of architects, officers, elected members and Civic Society members who look at applications for innovative new design and are able to offer technical and professional advice. Does a similar group exist in North Norfolk that could offer support for this type of development? 8.71 When looking at sustainable building techniques and criteria specialists in this field should be approached in order to ensure that proposals are deliverable. ENV 9 – Please consider materials, for example timber cladding is not vernacular and can be at odds in traditional settings and excessive glass in proportion to wall area can cause inappropriate glare and light pollution across the landscape which in turn can have adverse impacts on the landscape character by interrupting the nightscapes and urbanising the rural settlements, as well as being detrimental to wildlife such as bats and migrating birds detracts.	Comments noted, such design panels sits outside the scope of the Local Plan. The creation of high quality built environment is fundamental to sustainable growth in North Norfolk and the policy approach is one that promoted conformity with the emerging Design guide SPD,
ENV9	Historic England (1215813)	LP705	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Paragraph 3.65: Welcome this paragraph. Suggest that more detail is given in relation to local materials and vernacular	Noted- consider the addition of text on local materials and

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					vernacular in paragraph 3.65 in the preparation of the plan
ENV9	Historic England (1215813)	LP705	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Welcome the policy and Design Guide. Welcome criterion 6 relating to the historic environment and criterion 7 referring to distinctive local character	Support noted
ENV9	Designworks (1217232)	LP303	General Comments	The 2019 version of the National Planning Policy Framework places much greater emphasis than previously on the vital issues of good design and constructive engagement with applicants. In view of the thorough and commendable objectives set by the Draft Local Plan, it is therefore disappointing to note little reference to the need to strive for design excellence and a creative interaction between professionals. A collaborative approach in which the architect, client, and planning authority develop an early understanding and common set of goals is the most logical and rewarding path to good buildings and environments. It is almost impossible to achieve the excellence that NNDC is clearly striving for without embracing this approach. To be effective, consultation needs to be at the earliest possible stage, and to be meaningful. Too often in some authorities there is a token process in which pointless non-committal comment is made at arm's length on a design already evolved, the stage at which it can be too late for the planning authority to influence the fundamental design, There are important economies to be had in the constructive approach described. For the planning authority: greater efficiency, with a reduction in potentially time-consuming conflict with applicants, sometimes leading to a costly appeal. For applicants: greater certainty that early engagement will lead to a speedier and more successful outcome.	Noted - The North Norfolk Design Guide provides the detailed guidance to support policy ENV 9. Consider the addition of wording regarding guidance in the policy wording itself.
ENV9	Norfolk Police (1217249)	LP294	General Comments	I would like to make you aware that I am submitting comments on the Local Plan Draft and Interim Sustainability Appraisal via the planning policy email. In particular comments on Detailing and Residential Development).	Comments noted

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV9	Norfolk Police (1217249)	LP734	Object	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</p> <p>Intro States “All development proposals should respond to current best practise and demonstrate that they are in conformity with the design principles set out in established..... Or other design guidance endorsed by the Council”</p> <ul style="list-style-type: none"> • Seek confirmation that North Norfolk Council endorses Secured By Design Guides,(8.67 Safety states SBD principles are expected to be incorporated within all schemes”) Also/ Draft Design Guide: 12) Signposting & Glossary: Placemaking - includes reference to SBD guides and therefore within point 8 of policy ENV 9 there is specific reference to SBD principles Policy Env 9 point 8 states: reduces opportunities for crime, terrorism and antisocial behaviour, creating safe, secure and accessible environments; request addition of ‘reflecting principles of Secured By Design’. 	Noted- consider inclusion of the additional wording proposed through the preparation of the policy.
ENV9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP621	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Seeks to set out the requirements necessary for good ‘place making’. It serves as a ‘catch all’ anchor policy for the related, North Norfolk Design Guide Supplementary Planning Document (SPD) and issue specific policies set out elsewhere in the emerging Local Plan. We support the policy and its aspiration to achieve high quality design, which aligns with Pigeon’s aspirations for site C10/1. However, we would highlight that the reference to development complying with the SPD is not compliant with the Regulations, which do not allow development plan status to be applied to supplementary guidance which have not been the subject of examination. As such, the Council may wish to consider stating within Policy ENV 9 that the SPD is guidance.</p>	Support noted. Consider comments in the development of the policy.
ENV9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy ENV 9 seeks to ensure new development is designed to the highest standard, successful in its function and respectful of the local environment, character and context. Further design guidance is set out in NNDC’s Design SPD which supports architecture and design that retains and reflects traditional architectural values. This is approach is supported, as it aligns with the development and design principles for DS7. Acknowledges the importance of high-quality design, but also recognises that all sites are</p>	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>individual with different characteristics and challenges that require different design solutions. The policy should be worded in such a way to allow this flexibility and should not impose specific design solutions, as per paragraphs 124 and 125 of the NPPF. Furthermore, the design process involves the balancing of issues that sometimes compete, and the policy does not appear to recognise this; it reads as a list of criteria that all development should meet. However, often certain criteria might have to be prioritised due to site-specific challenges. The policy should be framed to recognise this and acknowledge the rationale behind how a particular solution is reached. To be effective and sound, the policy should be clear in its requirements as per NPPF paragraph 16. For example, the need for adaptive and accessible homes is supported, however, Point 10 seeks to “ensure” compliance of an “optional” document. It is suggested that this point is reworded to ensure that development complies with the appropriate national Building Regulations standard.</p>	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV9)
Objection	2	<p>The approach was generally supported with the recognition that the NPPF places significant weight on the need to secure and improve design through high quality development. Some concern was raised around the ability of all proposals due to scale and stage of application in being able to confirm to the NNDC Design Guide and suggested consideration of the additional wording "where relevant" and noting that the policy should be worded in such a way to allow this flexibility and should not impose specific design solutions, as per paragraphs 124 and 125 of the NPPF, Others suggested and in cases offered the consideration of assistance and policy requirement through appropriate Design Panels and requested consideration of including more detail in the policy around the use of local material and distinctive local character. To be more effective it was suggested that the policy could link in stronger to overall objectives and should seek to proprietries certain criteria so that it is clear these are essential across the Plan thus introducing some certainty around the expected approach and allowing flexibility around other criteria due to site specific challenges.</p>
Support	4	
General Comments	4	

Alternatives

ENV9	Mr & Mrs Johnson (1215700)	AC033	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Partially Supports Assessment ENV9. - Larger properties and/or second homes built by individuals along the NN coast on infill sites are in many cases very poorly conceived and detailed, use inappropriate materials, are of unsympathetic character, too large and in no way serve to enhance the character or appearance of the area. We would welcome a policy to prevent the proliferation of such unsympathetic development.	Comments noted: This comment repeats the support ENV9 made against the First Draft Local Plan (Part 1).
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Policy ENV10 - Protection of Amenity

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV10	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree. Essential. Particularly in respect of noise, disturbance, and erosion of the character of a place.
ENV10	West, Dr Louisa (1210536)	LP059	Object	The redevelopment of farm buildings adjacent to other peoples homes for second home/holiday lets must be considered.
ENV10	Adams (1215905)	LP588	Support	Road traffic noise is one of the most common causes of dissatisfaction with housing. The loss of amenity and adverse health effects of road traffic noise should be specifically covered. Housing should not be built close to busy roads and where at all possible an agricultural buffer should be maintained between main roads and residential development. This policy would not only provides a better living environment for the residents but also reduce the visual impact of the development. If it is the Councils aim to provide the best possible housing in the best possible environment for the benefit of its residents then consideration of the impact of road traffic noise on homes and gardens must be up there at the top of the list. Include in the list "the impact of traffic noise on homes and private amenity space"

Individuals	Number Received	Summary of Responses (Policy ENV10)
Summary of Objections	1	One objection received, raises concern over the redevelopment of farm buildings for second home/holiday.
Summary of Supports	2	Two support this policy, particularly in respect of noise, disturbance, and erosion of the character of a place. Suggest that this policy should consider the loss of amenity and adverse road traffic noise on new housing. Buffers should be provided between new housing and busy roads.
Summary of General Comments	0	None received
Overall Summary		No substantial issues raised. Buffers between roads and new residential development should be considered in the finalisation of the policy.
Council's Response		Noted: Consider the specific reference to the step back of residential development and buffers from main roads as a consideration in the finalisation of this policy and the inclusion in the list "the impact of traffic noise on homes and private amenity space"

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV10	Sheringham Town Council (1217426)	LP548	General Comments	STC agrees with NNDC that light and noise pollution arising from new development can have a significantly damaging impact on the countryside and settlements in north Norfolk. Our area boasts some of the darkest skies and this lack of artificial light helps the area retain its rural character. Lighting in new developments should be limited to that necessary for security. Consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky-lights etc.	Comments noted: Consider comments in the development the policy.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV10)

Objection	0	Support expressed for the inclusion of external light considerations.
Support	0	
General Comments	1	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV10	Broads Authority (321326)	LP806	General Comments	8.80, 8.81, 8.82 – also mention the Broads and dark skies – we have intrinsically dark skies and a light pollution policy (DM22)	The NNDC LP only covers the areas outside the Broad's consideration however could be given to referencing any approach in the emerging LP for the broad's
ENV10	Environment Agency (1217223)	LP467,468	General Comments	Paragraph 8.84 There are lots of food and drink businesses within the plan area so amenity issues from odours is likely to be our biggest concern. It is important that any potential issues are addressed in the planning process rather than delegating responsibility wholly to the permitting process which may mean it's too late to resolve planning issues. This also allows issues to be flagged at the design stage which is more efficient and less costly. • Policy ENV 10 – Protection of Amenity We recommend that water pollution and the maintenance of water quality is also included within point 8	Noted: Consider comments in the development the policy and future iteration of the Plan.
ENV10	Norfolk County Council (931093)	LP739	Support	Para 8.81 - Consideration should also be given to ways of minimising light pollution from exterior lighting, large glazed areas, sky lights etc., and be sensitive to the impacts on biodiversity. [More information is available at https://www.bats.org.uk/news/2018/09/new-guidance-on-bats-and-lighting and the Institution of Lighting Professionals (ILP) has published guidelines].	Noted:- Consider comments in the finalisation of the policy
ENV10	Creting and Coast, Mr John	LP606	Support	The policy provides a list of detailed assessment criteria, but not all are discussed within the Design Guide. If these criteria are to be used to assess the	Noted Consider comments in the

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	Fairlie (1217414)			acceptability of a scheme then clear thresholds or guidance should be provided. For example, what is an acceptable level of overshadowing on private amenity space (particularly noting that some shading is now encouraged to support climate change mitigation)? This is clearly covered within the BRE Guide 'Site layout planning for daylight and sunlight: a guide to good practice (BR 209)', but there is no guidance from the Council with respect to what they consider to be acceptable.	finalisation of the policy consider consistency between policy and North Norfolk Design Guide

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV10)
Objection	0	The inclusion of the policy was generally supported. More prescription was suggested and further enhancement of expected standards included in the Design Guide on issues such as acceptable level of overhanging and access to sunlight etc. Consideration could also be given to ways of minimising light pollution. The EA. suggested that water pollution and the maintenance of water quality is also included within point 8.
Support	2	
General Comments	2	

Alternatives

ENV10	Mr & Mrs Johnson (1215700)	AC034	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Supports Assessment ENV10. - Essential. Particularly in respect of noise, disturbance, and erosion of the character of a place.	Comments noted: This comment repeats the support ENV10 made against the First Draft Local Plan (Part 1).
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Policy ENV11 - Protecting and Enhancing the Historic Environment

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV11	Carr, Mrs Elizabeth (1216730)	LP385	General Comments	More emphasis needs to be made of the historic buildings in the area especially the churches. Church trails following bus routes, footpaths, cycle routes, etc. that are clearly marked would energise the local economy/community and provide more tourism to the area. Places that have been used in films are also potential sources of tourism.
ENV11	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP264	Object	<p>We note the requirement of Policy ENV 11 that development proposals that would affect the significance of a designated or non-designated heritage asset and/or its setting, or any known or possible archaeological sites, will be required to provide, in the form of a heritage statement, sufficient information proportionate to the importance of the asset and the impact of the proposed development, to enable any impact to be accurately assessed.</p> <p>A pre-application advice request was submitted to the Council in 2018, for 50 units on Land east of Norwich Road. The Historic England response stated that ‘developing the agricultural field would change the setting of the Grade II* listed building in a ‘fundamental way’, resulting in a harmful impact on the ‘historic significance of that building though inappropriate development in its setting.’ However, the Council’s Conservation officer noted that the harm must be classified as ‘less than substantial’ for NPPF purposes, and the harm should therefore be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. Taking account of the pre-application advice request received, the number of units proposed on the site has now been significantly reduced, to reduce the impact of the proposed development on the heritage assets. The revised scheme for the site only looks to accommodate 20 homes, rather than the 50 originally proposed. The indicative masterplan, which is submitted with the Call for Sites form and with these representations therefore shows;</p> <ul style="list-style-type: none"> • A significantly reduced footprint of the proposed development, which is now focused in the north western part of the site, away from the setting of the church, to retaining an open agricultural field between the proposed development and the church; • Land is available for the use of the church (which is already used for informal car parking occasionally) to the south of the site; • The density of the development has been reduced; • The form and layout of the site is now much less compact, and has significantly more landscaping and open space provision within the site; • A view of the church has been created from the north west corner of the site down a tree-lined avenue through the development; this axis also provides a footpath and cycleway into the site; • The proposed vehicular access has been relocated slightly further south on the A140 so that it does not impact on the Grade II listed property Strand Cottage. Any impacts on heritage have therefore been carefully thought

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				through and addressed. Further, if the site is allocated in the Part 2 Plan, a full heritage and archaeology assessment will be carried out, to inform future iterations of the layout of the site.
ENV11	Johnson, Mr & Mrs (1215700)	LP141	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Agree
ENV11	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: As representatives of a historic market town with a conservation area which covers our town centre, we are extremely sympathetic to Policy ENV 11 and we welcome the resumption of conservation area appraisals for the District as a whole. We would not like to see any weakening of this draft policy.

Individuals	Number Received	Summary of Responses (Policy ENV11)
Summary of Objections	1	One objection received in relation to application advice and with regard to a specific site.
Summary of Supports	1	Agree.
Summary of General Comments	2	Two general comment received wishes to see an increase in emphasis/protection of existing historic buildings. Welcome this policy and welcome the resumption of conservation area appraisals for the District. Would not like to see any weakening of this policy.
Overall Summary		No substantial issues raised. General comments received supported the approach.
Council's Response		Noted

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
ENV11	Cley Parish Council (1217592)	LP648	General Comments	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: More should be done to preserve heritage assets such as flint walls. Cley has a number of important ancient flint walls which are slowly getting replaced in association with minor development proposals such as extensions etc. Cley wishes to enhance and protect its historic environment, more effort needs to be done to protect flint walls which are affected by development.	Noted: The Council is supportive of Local communities bringing forward non strategic policies which add / address local distinction through neighbourhood planning

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy ENV11)
Objection	0	More effort needs to be done to protect flint walls which are affected by development.
Support	0	
General Comments	1	

Statutory Bodies & Other Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
ENV11	Broads Authority (321326)	LP806	General Comments	8.89 – might need to refer to shared Conservation Areas with us at Ludham, Horning, Stalham and Neatishead.	Noted: Consider clarification in future iteration of the Plan
ENV11	Norfolk County Council: Historic Environment (931093)	LP739	Support	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: For greater clarity and accuracy, we recommend that Section 8 is sub-divided into three categories; Natural Environment (Sub-Categories as listed in the Plan) Built Environment High Quality Design Protection of Amenity Historic Environment Protecting and Enhancing the Historic Environment This structure would give appropriate emphasis to the whole of the historic environment and would ensure that each category title accurately reflected the content of the policies presented within it. PARA 8.3 This paragraph only mentions built-heritage designations (Conservation Areas and Listed Buildings). To be consistent with other parts of the Plan and the Sustainability Appraisal, it should also mention, as a minimum, Scheduled Monuments and Registered Parks and Gardens, and as with 5.15 above, it would be beneficial to mention the importance of non-designated elements of the historic (and natural) environment. PARA 8.85 Suggested changes in red “The Local Plan aims to ensure that North Norfolk's built heritage historic environment is conserved or, wherever possible enhanced and that new development is of high quality design. Paragraph 185 of the NPPF states that “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment”. The NPPF also states that Local Plans should include strategic policies to “make sufficient provision for ...conservation and enhancement of the ...historic environment” (Paragraph 20). The quality of the built environment and the presence of historic archaeological heritage assets make a valuable contribution to the appeal and</p>	Support for Policy ENV11 is noted and welcomed. Consider feedback around supporting section text in the finalisation of the Plan

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				<p>character of North Norfolk.” PARA 8.86 The importance of all non-designated heritage assets should be emphasised. Suggested changes in red; “There are 81 Conservation Areas, 2265 Listed Buildings, including 94 Grade I and 202 Grade II*, 86 Scheduled Monuments and 33 Historic Parks and Gardens within the District. There are also numerous non-designated heritage assets (comprising both built- and archaeological heritage) including 190 buildings on the Council’s Local List. These are buildings that do not fully meet the criteria for being nationally listed but are considered of architectural or historical importance for the local area. Local Listing does not introduce any additional powers of control, instead it acts as a means of identification and plays an important role in the assessment of development proposals. The effect of an application on the significance of a non-designated heritage asset is a material consideration when deciding planning applications, and, in the case of built-heritage, Local Listing strengthens the case for retention of a historic building. The number of non-designated heritage assets on the list is likely to increase over time as new buildings and other assets are identified. The requirements of the policy equally apply to any local heritage assets identified and listed in adopted Neighbourhood Plans.” POLICY ENV11 – The County Council consider that this is a well-worded policy that makes appropriate reference to the full breadth of the historic environment and acknowledges the importance of non-designated heritage assets. We particularly welcome the inclusion of Point 4 - that the aims of the policy will include, “increasing opportunities for access, education and appreciation of all aspects of the historic environment, for all sections of the community.” This will help to ensure that appropriate levels of public engagement and dissemination are achieved on development-led archaeological projects</p>	

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ENV11	Norfolk Coast Partnership, Ms Gemma Clark (1217409)	LP516	General Comments	ENV 11- The addition of extensive glass and modern extensions clad in materials such as aluminium, copper and wood are damaging our historic environment and locally distinctive settlements. Although these additions are seen as minor when considered in isolation, they are cumulatively eroding the character of these places. How can this be considered in the policy?	Comments noted. Consider comment in the finalisation of the Policy.
ENV11	Historic England (1215813)	LP705	Object	<p>OFFICERS SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: Paragraph 8.85 change 'built heritage' to 'historic environment'. Paragraph 8.87 We welcome the clear interpretation of the NPPF tests for harm in this paragraph. This paragraph should also state that harm should be avoided in the first instance. Only where harm cannot be avoided should mitigation be considered. Amend paragraph to make it clear that harm should be avoided in the first instance. This is a very comprehensive policy but as such is quite long. The policy may be easier to navigate with the use of subheadings.</p> <p>We welcome the mention of settings. The policy is broadly consistent with the tests for harm in the NPPF, although no differentiation is made between those assets where substantial harm should be exceptional (Grade II) or wholly exceptional (Grade II* and Grade I). This differentiation should be made for consistency with the NPPF.</p> <p>There is currently no policy framework for addressing heritage at risk. We recommend the inclusion of a policy basis to address Heritage at Risk. The National Heritage at Risk Register can be found and searched here by local authority: www.historicengland.org.uk/advice/heritage-at-risk We also recommend the creation and management of a local Heritage at Risk register for Grade II listed buildings. Similarly, we welcome positive local solutions for addressing all heritage at risk, whether nationally or locally identified.</p> <p>We are pleased to see that you have a Local List of buildings. It would be helpful</p>	Noted - consider change to wording in the preparation of the plan. Consider the following in the preparation of the plan: use of sub headings; differentiating between exceptional and wholly exceptional scenarios; including a policy to address heritage at risk; including local list criteria in appendix and include a hyper-link to the list; adding more on archaeology.

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				to include the criteria for Local Listing in an Appendix. It would also be helpful to have more detail in relation to archaeology.	

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV11)
Objection	1	Historic England noted that the policy was comprehensive and broadly consistent with the test for harm in the NPPF, never the less they objected to the approach. Key issues included no differentiation is made between those assets where substantial harm should be exceptional (Grade II) or wholly exceptional (Grade II* and Grade I) and there was no policy framework for addressing Heritage risk. The inclusion of local list was welcomed though it was suggested the criteria of inclusion could be a useful addition in an appendix. NCC in its statutory roll on the Historic environment supported the approach, seeing it as a well-rounded approach. Further clarifications mainly in the supporting text were provided for consideration.
Support	1	
General Comments	2	

Alternatives

ENV11A	Norfolk County Council: Historic Environment (931093)	LP739	Support	The County Council agree with the Preferred Approach which identifies the need for a policy to ensure a positive approach to the conservation and enhancement of the historic environment. The Alternative Approach (no policy) would not be acceptable.	Support for the preferred approach and dismissal of the alternative is noted
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