

Appendix 2 - Schedule of Representations

Extract of Report of Representations

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

Policy ENV4 (in relation to RAMS) Regulation 18 Responses

Individuals

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
ENV4	Yardley, Mr Christopher (1218066)	LP688	Support	~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 ~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.
ENV4	Spowage, Mr Richard (1216878)	LP326	General Comments	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.
ENV4	Johnson, Mr & Mrs (1215700)	LP141	Support	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
ENV4	Bell, Ms Jane (1218416)	LP799	Support	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

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				inevitable, irreversible ecological damage? That is what 'adversely affected' means. pp . 129; 135 – 137 Par. 9.49, 9.50
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 Strategy57” . 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 and Town Council's

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
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

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ENV4	Environment Agency (1217223)	LP463,464	General Comments	<p>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 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>	Noted: Consider comments in the development the policy and future iteration of the Plan.
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</p>	Noted. Consider feedback in the development of this policy and monitoring requirements. Evidence contained

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				<p>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-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>	<p>within the emerging RAMs strategy will inform future iterations of the Plan and this policy area in relation to European Sites</p>

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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 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</p>	Noted:- Consider comments in the finalisation of the policy

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				<p>functions'. Bullet 3 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 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	<p>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 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>Noted, Support welcomed - disagree (partly): Evidence contained within the emerging Recreation avoidance and mitigation Strategy and in line with advice from natural England will be used to inform future</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					iterations of the Plan and address impacts on European Sites
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 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</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
				developer in support of determination of their application. This includes potential contributions which would support the ecological network..	
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 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</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 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
				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.	
ENV4	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	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.	Support noted. Consider comments in the development of the policy.
ENV4	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP316	Object	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 polices 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	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

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					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

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy ENV4)
Objection	1	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.
Support	5	
General Comments	4	

Alternatives

Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Alternative Policies)	Council's Response
ENV4	Mr & Mrs Johnson (1215700)	AC028	Support	OFFICER SUMMARY – SEE ATTACHED FILE FOR FULL SUMMARY: 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	Comments noted: This comment repeats the support ENV4 made against the First Draft Local Plan (Part 1).