

## Appendix 2 – Schedule of representations and responses

### Housing Policies

#### Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
HOU1	Amey, Peter (1209779)	LP011	General Comments	Before permitting further development in and around the Hoveton area consideration must be given to the ever increasing traffic flows through the village. This is a tourist area and the main A1121 is one of the worst areas of pollution in the county caused by the slow moving and often stationary traffic belching out fumes for the tourists to inhale whilst they walk around the shops, cafes and other amenities. More houses means more people and thereby more cars resulting in more noxious gases. It is not just the building development in Hoveton that is the problem but any development north of Hoveton that wishes to travel to Norwich or connect with the NDR. To keep poisoning residents and tourists alike is unacceptable and the problem needs to be addressed before any further development takes place
HOU1	Alexander Mr & Mrs (12118472)	LP782	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> My husband and I believe this development of 2000 houses on Farm land is a big mistake. Firstly in North Walsham we have not got the infrastructure at the moment to deal with the amount of people who are here now examples; doctors, dentists, home care, schools, hospitals, road structure, drainage and electric supply. Secondly we should build council homes for the waiting list of people in the area. They should be built on brown sites and owned by the council so they are affordable. We need the farm land to produce food for the country, why put profit for the few over the wellbeing of the community. - Most of the houses being built will be for outsiders coming into the area, not for the youngsters who live here and want to have a decent home with reasonable rent or houses to buy which they can afford. Also for the elderly downsizing homes that would improve their life. Also where are the jobs for the influx of people coming into the area?
HOU1	Cheeseman, Mr Alan (1218485)	LP677	Object	The proposed plan to build over 2000 new houses in the area is a serious misjudgement. To add an extra 2000 + households to the area would increase the population by almost 50%! The current infrastructure of the town will not be able to support this number of people. An influx of a great many more residents would mean increased traffic and movement of people in an area that already has a 'poor' system of roads. environments and habitats for our flora and fauna changed and lost forever. The area would benefit the community if it was used for sustainable agricultural food production, employing local people to manage it. There appears to be no apparent attempt to address the ever- present threat of climate change.

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HOU1	Carr, Mrs Elizabeth (1216730)	LP438	General Comments	<ul style="list-style-type: none"> <li>• Whilst second homes/holiday homes may stand empty for some of the time and may not contribute to the local economy they do ease the strain on the local NHS and traffic on local roads...insisting on full time occupancy for new build homes would help ease the 'community' situation but increase problems with lack of provision of infrastructure.</li> <li>• With larger new build executive 'second' homes, a way of deflecting ownership away from absent owners towards full time occupancy would be to increase the size of the garden. Make affordable homes more affordable. Restrict some new housing developments to full time occupancy.</li> </ul>
HOU1	Cole, Mrs Teresa (1209821)	LP029	Object	I note in your Planning Minutes of October 2018 that the " latest household projection figures published in September had indicated a dramatic fall in population and household formation which suggested that lower housing targets in the Local Plan would be defensible The Government was revising its methodology as the projections suggested that the required number of dwellings would be less than the Government's policy position. Based on the figures, the Council's target had fallen from 520 dwellings per year to 438 per year, which would result in 8,700-8,800 new dwellings in the Plan period instead of up to 11,000 which had been agreed at the last meeting. " remove the allocation for development of the land at Runton Road/Clifton Park from the proposed draft plan
HOU1	Cook, Mr Geoff (1216625)	LP209	Object	Sustainable Development I would question the need to provide up to 11000 more homes in North Norfolk with a projected increase in population of 10000 people, especially when more people are dying than are being born in the district. If the average number of people per house is 2 only 5500 houses would be needed and new developments and planned developments should reduce the number even further. It is unclear whether the proposed number of houses could even be built – "Council needs to consider deliverability of 30% more houses per year than currently" The plan needs to be consistent with the percentage of the older population (in 2011, 58% of the population was over 45 but in 2036 40% will be over 65) as this will clearly affect the planning assumption that the older population will increase and what housing is required.
HOU1	Witham, Mr I M (1216498)	LP348	Object	The housing target is excessive, with too great an emphasis being placed upon projected figures for migration into the area from elsewhere in the country. I advocate a complete re-think, on the part of both the district council and Central Government, on the principle of working-in such a high projected figure of in-migration into Norfolk and this district, from other parts of the country, in the housing allocations.
HOU1	Young, Mr David (1210531)	LP051	General Comments	<p>~Concerns regarding the impact of second and holiday homes on the housing supply and market.</p> <p>~the occupants are not in situ for long enough to make any meaningful contribution to the life of the local area</p> <p>~prices have escalated to a level far beyond the dreams of most local young families or individuals</p> <p>~villages are in danger of atrophying to the extent of becoming "ghost towns" in the off season and their long-term viability being precarious.</p> <p>~it is tempting to suggest the St. Ives option, under which all new-builds are for permanent residence only. In the context of North Norfolk, one could go further and require such permanent residents to have a "local</p>

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				connection" as per the Local Lettings Agreement, or at least such a connection to North Norfolk as a whole. Such a restriction would not need to apply to the whole of North Norfolk: perhaps only the coastal strip between Wells and Weybourne, or to the coastal AONB.
HOU1	Symonds, Ms Ann (1209801)	LP208	General Comments	Since Beeston Regis is in close proximity to Sheringham and services and amenities are shared Beeston Regis could be considered for overflow if Sheringham or Cromer become over burdened, or at least provide a more 'rural' form of residential development for those not wanting to be located in a town setting. Land in Beeston Regis considered as countryside should be considered for eco developments and green living options. The environment and landscape could dictate what type of sensitive development or other use takes place. By decentralising development it would relieve transport congestion and other issues faced by a growing population in the coastal areas.
HOU1	Swift, Mrs Julie (1216911)	LP249	Object	I believe that we are overdeveloping North Norfolk and I believe that could detrimentally impact our tourism, which is a large part of our economy. Towns like Holt and Cromer are thriving tourist towns. However, the majority of tourists come here to see the lovely market towns and villages with their brick and flint properties. They do not come to see sprawling housing estates that look exactly like the ones around London or in the Midlands. Mass produced designs that do not reflect the character of the area. Also the number of estates being built is already affecting the road network. Towns like Cromer are grid locked outside of the tourist season these days. People could stop coming the area due to the overdevelopment and poor designs of development and the Highways problems caused by all this development (no one wants to spend half of their holiday sat in a traffic jam through Cromer). What happens to the local economy if tourism decreases? The holiday homes will be sold flooding the market. We could end up in a depressed area with a mass of empty decaying old and new properties alike. I do not know where all these extra people are coming from to fill these thousands of new properties. Are they moving from old traditional properties? If so will they become holiday homes or even worse empty shells? I feel that NNDC are failing in their duty to protect the character of this lovely area in which we live and they are failing to consider Highway safety in the area as we do now have the road network to support this constant development proposed. Seeking a more sensitive approach to development in North Norfolk, with thought given to design and to the road networks in the area.
HOU1	Swift, Mrs Julie (1216911)	LP248	Object	Southrepps is a 'rural' village with working farms, both arable and livestock. Its road network comprises of mainly single-track rural lanes. The main road through the village is regularly used as a cut-through to the A149 and A140 from Mundesley. The 'main' road through the centre of Southrepps is not capable of carrying two medium/large vans side by side. The figures on the Parish Councils website from the new SAM2 unit already record over 60,000 vehicles a month passing through the village (30,000 in each direction). The SAM2 unit also records a high percentage of these vehicles travelling at speeds in excess of the 30mph speed limit. Further development in Mundesley will increase these traffic numbers further and will put an intolerable strain on the road network through Southrepps and will endanger vehicular and pedestrian users of these roads. I am

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				seeking a more sensitive approach to development in North Norfolk, with thought given to design and to the road networks in the area.
HOU1	Swift, Mrs Julie (1216911)	LP247	Object	I am seeking a reduction in the number of new houses planned for Mundesley due to the impact it will have on the local area roads. As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). At an absolute bare minimum 2500 houses will generate a minimum of 17,500 car movements per day. The one way system through North Walsham is not designed to handle these volumes of traffic. It isn't just the cars - its the associated delivery vans etc. that will be visiting the properties as well. North Norfolk does not have the infrastructure to take this level of development. Also where will the occupants of these 2500 houses work? There is not enough employment in the area to sustain this level of increase. Creating employment areas is not enough - the brownfield site by Waitrose has been an eyesore for 20 years or more s no big companies want to be based here. Are we now going to be a housing area for London commuters? People who will not support the local area? Where are all the occupants for these houses coming from?
HOU1	Swift, Mrs Julie (1216911)	LP246	Object	I am seeking radical changes to bypass Cromer Town Centre for vehicles and a drastic reduction in the number of houses proposed. The roads cannot cope. A bypass however, will not help the lack of doctors available. For this I seek a reduction in the houses proposed. I work on the main road through Cromer and have done for 16 years. In the past during the "peak tourist" times like Easter and the Summer School Holidays the main road outside my office regularly ground to a halt due to the volume of traffic and getting into and out of work was difficult. However, outside of these peak times traffic flowed reasonably well. However, now the traffic is continually crawling through Cromer all the time. There are regularly queues to get through the town...and this is before the peak tourism traffic hits. The development up the Roughton Road has definitely had a noticeable impact already. As a rule of thumb Highways estimate 7 car movements a day per property (often this can be far more if there are multiple cars at the property). The Local Plan wants to add almost 600 extra houses - even at its bare minimum this would generate over 4,000 extra car movements per day through Cromer. In reality it would probably be nearer to 5,000+. The roads will be permanently grid-locked and in peak tourist season no one will be able to get into or out of the town. People who work or live in Cromer simply will not be able to get into or out of work/home. It isn't just the roads. The Doctors surgeries in the area cannot cope with more people. My husband has a heart problem and had to wait two weeks to see his doctor to discuss concerns he had with his health. This will only get worse with 600 new properties...adding thousands more people to the Doctors patient lists. It is no use building more surgeries if there are not the Doctors to fill them. Cromer surgery has lots of empty consulting rooms but cannot get the Doctors to work in them. Cromer does not have the infrastructure to deal with the planned increases in housing.

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HOU1	Faulkner, Mr Anthony (1216674)	LP532	Object	<p>Provision for new housing in the coastal parishes such as Blakeney should not include market housing but should be limited to affordable housing only, for which there is a great demand, due to the low level of pay in these areas compared with the high cost of property. Market housing is likely to largely, or entirely, be used as holiday homes and will not therefore contribute to the national need for permanent housing. Development in these parishes should be for affordable housing on exception policy land where the future use as affordable is guaranteed. This would keep down the cost of the land allowing housing associations to be able to fund the cost of building without the need for subsidy from market housing. Market housing should be allocated to towns where there is opportunity for work, or inland villages on, or near, public transport routes to employment centres. These villages will benefit from some development, helping to retain shops, surgeries and other amenities and the houses are likely to become permanent residences, unlike those in the coastal parishes. Remove the allocation of market housing from the coastal parishes such as Blakeney. Select smaller sites for affordable housing on exception policy land, perhaps for groups of six to ten houses. Possible sites would be on part of BLA01 as an extension of Oddfellows, or on BLA05 because of its proximity to the primary school.</p>
HOU1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052)	LP266	Object	<p>The Policy should be more flexible, so that more homes can be delivered in Small Growth Villages if sustainable sites are available. The policy should be amended to make it clear that the figures in Policy HOU 1 are not maxima, but minima. Policy HOU 1 makes provision for the delivery of 400 new homes in the Small Growth Villages; these will be allocated in the Local Plan Part 2. However, this figure should not be taken as a maximum. The NPPF aims to significantly boost the supply of housing. While the Plan seeks to make provision for the current housing requirement, this figure could increase, and the Plan should be sufficiently flexible to adapt to any increases in housing requirement in the near future. Paragraph 2.13 of the Background Paper 1 – Approach to Setting the Draft Housing Target – notes that ‘the housing target likely to be included in the final Local Plan might change’ and that before the Plan is due to be examined, the 2018 based ONS household projections will have been published, which could result in a change to the housing target in the Plan. As set out in paragraph 7.18 of Background Paper 2 (Distribution of Growth), Roughton has key services including a primary school and a GP surgery, a wide range of secondary services including Post Office, public house and meeting place, and a number of desirable services including a petrol filling station and a place of worship. Roughton also lies only 3.2 miles south of Roughton Road railway station, which provides train services to Norwich. Bus stops in Roughton on the A140 provide easy access by bus to Cromer, which is located 3.7 miles to the north. North Walsham is only 6.5 miles away, and Norwich 19.6 miles. The housing target for villages which offer shops and services to their own residents and to those in smaller villages in their catchment areas should not be restricted to a total of 400 units, if further units can provide sustainable development, and can contribute to the continued vitality and viability of those villages.</p>

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HOU1	Taylor, Ms Siri (1216252)	LP188	Object	I question the need for the amount of housing proposed for Cromer, is this based on central government population growth projections? how does this tally with our actual local figures? Based on the overall number of houses proposed for the town (590 dwellings) how will Cromer's infrastructure cope with this huge increase in traffic and population. The doctors surgery is already under pressure, the roads cannot cope - especially during the summer gridlock. Cromer is the only large town development which has no bypass - nor, because of the geographical layout, is there any viable means of building one. What jobs can we offer these new residents? There are not enough affordable low cost or rental units in the proposed plans, I wonder whether the alternatives have been adequately investigated. Particularly the development of housing within existing structures e.g.: flats above town centre shops and in empty or redundant buildings, freeing up holiday homes by increasing their council taxes and developing more council controlled housing. As a town which relies heavily on tourism based on our landscape and coastal aspect - as well as our traditional, unhurried and uncrowded atmosphere, I suggest the plans should seriously take this into account. As a council which recognises the declared climate emergency this is the time for innovative thinking, surely it would be sensible to investigate alternative solutions to local housing needs.... or we seriously risk "killing the goose which lays the golden egg". Recalculate proposed number of houses. Investigate alternative housing in existing buildings - creative thinking! NNDC should strive to protect our tourism offer by limiting excessive new development, and aim to support the recognised Climate Change Emergency by protecting our important existing green amenity spaces.
HOU1	Mr Daniels (1217050)	LP257	Object	The plan needs to fully assess address the pressures arising from Norwich on the North Norfolk District housing market and seek to address this. The plan is too focused on North Norfolk District and does not fully consider external influences
HOU1	Johnson, Mr & Mrs (1215700)	LP142	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Evidence of how the original figure of 8000 new homes was arrived at should be included. In the interests of transparency the strategic housing market assessment should be appended to show how the council has arrived at this figure. Should the uptake of sites not be fully realised but at least 8000 (your figure) be built thereby meeting the Government's target would the council review the target and determine at that time whether it is appropriate to continue to the figure of 11000, whether the uplift is still appropriate or needed, or re assess the figure and lower it in order to avoid over development? Is there provision in the plan / policy to do so or is the county locked into building 11000 houses regardless of changes in demographic or demand? HOU1a and HOU1b are definitely inappropriate. Any policy should be capable of review during its life and not have a target simply set for 20 years
HOU1	Johnson, Mr Jamie (1216384)	LP345	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is commendable that the local plan is considering in paragraph 9.7 small developments of 2 to 3 dwellings on greenfield sites to address

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				the need for growth, future viability and vitality of rural communities where conditions for permanent residence restrictions would be applied.
HOU1	Stubbs, Mr Nick (1217346)	LP335	Object	We already have a high proportion of holiday homes, indeed one of the few areas for development (The Parishes) has recently been completed, with every property sitting empty for much of the time - I understand they are all second homes. There is even a house in Beck Close which has been left boarded up which surely could be utilised. Location specific evidence needs to be gathered to confirm what are the actual needs of any town/village in the region, rather than a top-down diktat to build, simply providing profits for developers
HOU1	Johnson, Mr Jamie (1216384)	LP347	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Paragraph 9.8 I would imagine it would be prohibitively difficult to police a second homes occupancy restriction and I would therefore instead be in favour of the approach described in 9.7 where greenfield infill sites within existing settlements or predominantly built up areas of designated countryside are permitted for 2 to 3 dwellings development subject to a permanent residence restriction and respect and cohesion with the prevailing local character. . This would be in line with NPPF paragraph 78: 'planning policies should identify opportunities for villages to grow and thrive'. NPPF paragraph 68. 'to promote a good mix of sites, LPA's should support development of windfall sites through policy and decisions giving great weight to the benefits of using sustainable sites within existing settlements'. NPPF paragraph NPPF paragraph 118 on 'Making effective use of land' paragraph which state that planning policies and decisions should "promote and support the development of under-utilised land" and "support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land" .
HOU1	Kelly, Mr Sean (1216516)	LP198	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> What evidence do you have of any "identified" need for this scale of development in Mundesley? You have arbitrarily allocated this number to Mundesley in order to meet the government target for the number of houses to be built in North Norfolk. You have then, simply to reduce the work load arising from the development of a new Local Plan identified an area of land of sufficient size to deliver the allocation in a single parcel. There is a ready supply of properties of all types for sale in Mundesley particularly at the starter home end of the market which would be attractive to local residents. There is no requirement for anywhere near this number of additional homes in Mundesley and, as evidenced by the recent development on the north side of this site it is highly likely that proposals will be to build as many expensive high end homes as possible. The scale of the development is not appropriate for the site as because of the topography of the and it will completely dominate the surrounding area. Any development of the southern area of plot 1 in particular will be several feet above the level of surrounding properties in Church Road, Church Lane and the north end of Manor Road. Any development in this area will completely obscure the horizon for all properties in that area. Because of the elevated position of the site any large scale development will be visible for miles around. The site is surrounded on three sides by the conservation areas of Mundesley a development on this scale, especially at the southern end of the plot will

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				impact negatively on those conservation areas by completely altering the character of the immediate surrounding area from open farmland to dense urban development. There will be no point in having a conservation area. There are no employment sites nearby so a development on this scale will result in a significant increase in commuter traffic as. This is also true for travel to secondary and tertiary education as well as healthcare facilities and all retail activity except for immediate local store type shopping. Replace the large scale development in the proposed plan with a significantly smaller development on this site and identify other smaller scale sites in the surrounding area. Restrict development on this site to the north west of the site so it will not dominate the existing homes that surround the current proposal and will be less prominent in the landscape. Any public open space should be formed in the area adjacent to Church Road and Lane to reduce the overbearing nature of the current proposal on the surrounding properties.
HOU1	Needham, Mr Colin (1216785)	LP269	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> I found the consultation documentation wordy, fragmented and hard to read so I may not have fully understood the basis for the calculations. My understanding is that there is a genuine social need for housing for residents to live in. I do not believe there is a social or economic need for allocated land for partially occupied second homes or homes to let for holidays. A community thrives when there are sufficient full time residents of all ages and aptitudes to make it work. Kids for schools, passengers for the buses, businesses for employment, support for neighbours, volunteers for community groups and indeed, congregations for churches and chapels. Allocating land in rural villages for developments suitable for sale for second homes and holiday letting will inevitably have an adverse effect on rural communities. The consultation document does not highlight or consider in detail this this adverse impact or offer remedies. The housing allocation should be calculated on the basis of need for those who wish to live (as full time residents) in the communities designated for growth. The construction of new houses on allocated sites and the conversion of existing houses for second homes should be positively discouraged. Within the limitations of planning policy this could be achieved by prescribing certain house types ,controlling housing density and the proportion of affordable and social housing in new developments.
HOU1	Noble, Dr Michael (1210275)	LP123	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> In Stalham a total of 150 new dwellings are planned. The Health Authority's view that that this will not impact on local medical services is over-optimistic. All GP services are under increasing pressure even without increasing the local population. This will also be true for local schools. The current proposals will therefore diminish services for existing residents and not provide the promised local employment opportunities. The use of greenfield sites is contrary to the historical aims of planning policy in this country and just adds to the environmental disaster we are leaving to the next generation. Surely a better use for these plots would be to provide green spaces such as parks with wooded areas for local families to enjoy. There are many good examples around the country which add quality to the health and wellbeing of the community and which would add to our environmental credentials by locking-up carbon rather than releasing more into the atmosphere. Please consult with local service providers



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				such as surgeries and schools to gain a realistic view of the impact of further increasing the local population. Please consider how this land can be better utilised to add to services for existing residents, such as local employment opportunities and green spaces for the benefit of the whole community.
HOU1	pettit, miss claire (1215847)	LP333	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> In 12/1 where it puts that Cromer has been chosen for large growth, and the 600 extra homes, 12/2 it contradicts this fact by mentioning the significant landscape constraints which limit the potential for growth. The extra pressure that this development would cause on the special character of Cromer re traffic in our already snarled up central one way system, parking, health services , etc., would be detrimental to locals and holidaymakers alike. To lessen the scale and number of proposed houses required ,thus removing the need for an extra school.
HOU1	Price, Ms Amanda (1210607)	LP070	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> more restriction on second home and part time occupancy - it is unwise not to restrict some portion of the new housing to full time occupancy, and to owner occupation. In Wells local people are saying that even a 28% allocation at a 20% reduction in costs ( I am sure new home builds will want to sell for as high as they can as many houses as possible) will still price local people out of the market, AND lead to even more houses standing empty for most of the year with only occasional lets. This is counterproductive for the local economy, So I would like NNDC t reconsider this policy. And also for those houses which are sold without such a restriction, there should be a higher Council tax and some tracking / monitoring of occupancy.
HOU1	Rayner, Mr Andrew (1217466)	LP635	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Type of development:- who is the housing aimed at? I fully understand the need for social housing and affordable (the definition of which means it is still usually expensive.). if its for second homes etc. then it is not acceptable.
HOU1	Rose, Mr Alan (1217227)	LP577 LP821	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Support house building - we all need somewhere to live. But what is planned is like adding a whole new town that's bigger than Stalham to North Walsham and I am worried that it is going to be done with hardly anyone having their say. When I attended a recent meeting in North Walsham to discuss the new Local Plan - there was just 32 people there. I spoke to a number of prominent businesses around the town and none of them were even aware that the Plan is being drawn up. Where were the voices of young people from the schools and the college who will inherit this town and have to live with the decisions being made that they have had no idea of or say in? The Town and District Councils should be engaging with these young people through the schools and college if this is to be an inclusive plan.
HOU1	Wells, MS Judith (1217777)	LP665	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is necessary to create additional housing in Wells next the Sea. The lack of affordable accommodation for the native community is already well-attested. My concern is that enforceable measures be taken to ensure that these proposed new properties do not become additional second/holiday homes, reducing the potential housing stock for local people. What will be done to ensure this?

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HOU1	Mr Phillip Duncan (1217309)	LP413	Object	Housing - Second home Ownership The Council confirms in para. 9.4 that new dwellings could be legally conditioned to ensure they could only be used as main residences, but that (in para 9.8) it is currently not minded to and will reconsider this following consultation. There is much written about the need for affordable homes and the pressure which second home ownership is causing on the potential to house local people. It is recognised in the Draft LP (e.g. para 9.25) that the District has a “low wage economy and in much of the area house prices are high”. The Draft LP recognises (para 9.27) the high level of need for affordable housing. If a high percentage of the homes which are planned for are taken up by second home owners, this adds further to the housing need and therefore risks inaccuracies and underestimation in the overall assessment of need. This would therefore support the use of legal conditions to limit second home ownership.
HOU1	Mr Phillip Duncan (1217309)	LP415	Object	Housing – Policy HOU1 The total growth proposed in Policy HOU1 for Cromer is very small in comparison to that proposed for the other Large Growth Towns. It is so low that it is more like the growth level proposed for Holt, a Small Growth Town. However, Cromer is (as noted in paragraph 12.1), the District’s main administrative centre; a popular tourist destination; centrally located in the District on the principal road network and railway line to Norwich; and hosts the District hospital. As such, the town should have a greater allocation of housing than is proposed in order to ensure its vitality. Furthermore, Cromer has the second largest retail provision in the District (para. 12.5) and is a “net importer of employees” (para 12.4). There is therefore, a clear need for greater housing in the town in order to reduce commuting. The town road network is widely accepted as suffering from bottlenecks and consequent rat-running. Norfolk County Council as Highway Authority has confirmed to us that there would be significant benefit in a new link road to the south of the town, between Norwich Road and Felbrigg Road, with a first phase joining the A140 Norwich Road with Roughton Road. The NCC Officer responsible for infrastructure has confirmed that the Authority is supportive of South Cromer development which would deliver a developer funded link road and other essential infrastructure such as a school, in a co-ordinated and planned manner. We therefore consider that the proposed housing targets in HOU1 should be revised so that Cromer receives a higher level of growth which is appropriate to its functional importance and to deal with unresolved commuting, transportation and infrastructure issues. See attached Paper: why Cromer should have more development than is proposed
HOU1	Bluss, Mr Andrew (1210045)	LP027	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Concerns the countryside is under threat from development. Appreciate that councils/authorities have been set housing targets. My main concerns are:- 1) Who are they for 2) Where they are sited 3) What potential impact will it have. From what I know, it is proposed that upwards of 1500 homes are planned for the west of North Walsham. Recognised there is a national housing shortage but how will the building of these properties benefit the town? These homes are being planned for the expansion of the “silver haired” generation who will (According to NNDC) be migrating from outside the county over the next 17 years.

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				All NNDC seem to care about is the number of houses they are required to build with little or no consideration of the full impact! What will this new population want with the proposed single primary school?
HOU1	Broch, Mr Daniel Sworders Grimes, Mr Kelvin (Agent) (1217619 1217618)	LP658	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Paragraph 77 of NPPF states: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.' Paragraph 78 of NPPF states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.' The Plan identifies Large Growth Villages as settlements which are local service centres, and which support rural sustainability. Blakeney is designated a Large Growth Village. However, the Plan only designates one site for development in Blakeney for 30 dwellings. This seems very limited in terms of allocating housing growth to Blakeney, in light of the Plan's recognition of the sustainability of the village. Blakeney have a range of shops and services and thriving community facilities, it has a primary school, and a regular bus service along the coast. The Plan should allocate more development in Blakeney, in recognition of its role as a Large Growth Village. The plan should allocate more development here, in recognition of its role as Large Growth Village.
HOU1	Brooks, Mr David (1217039)	LP253	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There is a very high percentage of second homes in Blakeney, Salthouse, Cley and Weybourne. Although this may be beneficial to property owners and for trade during holiday periods this can have the effect of destroying local neighbourhoods. Impact on affordability for younger people who want to start on the property ladder as a high number of new properties are priced and aimed at 'second home' owners. Other areas of the country such as St Ives and in Northumberland are taking action to restrict sales of properties to second home owners and details were provided to David Young and Sarah Butikofer in May 2015. Is the Local Plan considering this aspect?
HOU1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The 2018 Government Housing Delivery Test identified that North Norfolk have delivered 126% of homes required over the three-year period ending 2017-18 which is positive. Anticipated current Core Strategy target of 400 dpa will increase to 553 dpa. However, The housing requirement should be a minimum figure not a range limited to a maximum of 11,000 and arguably higher to provide the flexibility to deliver sufficient housing in accordance with recognised need throughout the plan period. Support the identification of 592 dwellings on sites in Cromer. However, to provide sufficient flexibility to deliver housing over the plan period – and for the avoidance of doubt, the wording should be amended to confirm that homes can come forward on allocated sites on the edge of the existing settlement boundaries of the Large Growth Town (within which Cromer falls) Releasing edge of settlement land for development in the instance Site C16 is both sound and justified, having

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				regard to national policy and the supporting evidence base. Nevertheless, it should be made clear that the 592 figure and 909 figure for the total growth (2016-2026) for Cromer is a minimum. Specifying a minimum requirement of 909 is a pragmatic and sound approach which will allow the plan to adapt to meet housing need over the plan period.
HOU1	Hull, Mrs Alicia (1210435)	LP048 LP049	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Building 11,000 houses, each with high carbon construction costs, and the associated infrastructure, will hugely increase carbon emissions. Dangerous policy, completely contradicting current knowledge, policies and priorities. New work and widespread consultation should be undertaken to produce a local plan fit for current circumstances.
HOU1	Ringer, Mr Callum (1218561)	LP772	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The council should priorities homes for local people, and make efforts to keep them affordable. Impose bans on second homes, as has happened in the south west. If possible, this should be included.
HOU1	Hammond, R. Hon Robert Harbord Ms Hannah WSP Indigo Payne (agent) (1219344)	LP828	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The Plan is generally sound having regards to the tests set out in NPPF. Plan prepared positively, it sets out a mechanism to meet North Norfolk's OAN. Housing numbers as a minimum number to be delivered in the plan period is an appropriate method of boosting housing supply and delivery
HOU1	Buxton, Mr Andrew (1218433)	LP761	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> 1. Proposed 10,000 or so houses is far too wasteful of scarce land
HOU1	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> I know orders are coming from national government, but I'm concerned that the building of such a large number of new properties in a relatively small market town isn't sustainable in these times of climate change, real poverty, and environmental debilitation. The town doesn't have the infrastructure to support such a large development (e.g. doctors' surgeries and other medical/home care provision, are both already oversubscribed).
HOU1	Rayner, Mr Andrew (1217466)	LP635	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Increase in population: Such development will require new roads, access to the town centre and its shops. Existing Roads can just about cope, how will traffic be managed? 1800 homes equates to at least 1800 vehicles. Parking in town is already difficult and will the extra traffic will lead to pollution and congestion. as some of the site is to be earmarked for commercial use there will also be a likely increase in commercial/service vehicles as well.
HOU1	North Norfolk District Council Members for	LP802	General Comments	The level of development which is proposed for North Walsham would impose a considerable strain upon our town. We share the concerns of the Town Council that the scale of growth suggested for North Walsham is unprecedented. If such growth is to occur then we must have timely and appropriate investment in our

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
	North Walsham Gay, Cllr Virginia (1218492)			infrastructure. The Western Extension Link road must join the North Walsham Industrial estate to the Norwich Road and that this road should be built before the construction of housing begins. Declared a climate emergency has significant implication for North Walsham as it is a growth town. We endorse North Walsham Town Council's requirement for a robust assessment of the threat which the proposed scale of growth would pose to medical provision within our town and we agree with them about the necessity for a new primary school accessible from a western extension link road running from the Norwich Road to the District Council's Industrial Estate.
HOU1	Willer, Mr Kevin (1210031)	LP022	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Opposing so many new dwellings in North Walsham, particularly on the western side of town. This kind of proposal is over development on a massive scale using many green belt areas. I understand the need for some housing but 2000 plus for North Walsham would be a disaster. The current infrastructure into and around the town is totally inadequate and busy at the best of times. Another 5000 people in the town meaning probably 2000 plus cars will cause chaos. In particular roads such as the Grammar school road and the old roads through town, which already suffer with heavy traffic, would not cope with more. The new link Road proposed may well stop some lorries coming into the town and allow people access to new estates but will go no way into solving the traffic problems around the rest of the town, more cars will only add to it. The effect on the environment also concerns me. Living on the Skeyton Road and enjoying views of the countryside we are privileged to see a whole manor of wildlife extending from our garden over to Weavers Way. We see deer, bats, hedgehogs, pheasants nesting, skylarks nesting in the field, owls plus many other species. Nobody ever seems to give a dam about the wildlife in a time when we really should be caring about them and our environment. More cars causing congestion means more pollution. Our children walking to and from school already suffer enough pollution. The council do not consider the lives of all those, like us, who are directly effected by the proposals. Having houses being built behind us and next to us will destroy our current lifestyle destroying views of outstanding beauty and destroying a peaceful life, which is why we moved to our house in the first place. Our properties will no doubt loose value, our ability to sell as of now is limited due to the uncertainty of what will be happening in the fields around us. Effectively our lives are on hold awaiting noise and disruption. Do we qualify for compensation? As it stands no doubt the landowners of the fields identified as new dwelling sites are set to become very rich whilst current residents suffer. People enjoy the peace of Weavers Way, effectively North Walsham's piece of peaceful countryside, but now this is to be ruined by being surrounded by houses and a road going right through it. The services in this town are already stretched to the maximum. There is a mention of a new primary school but what of the impact on the high school and college? The Doctors surgery is constantly busy, it takes weeks to get an appointment, having attended the drop in session at the community centre today I heard the planner say that's a problem for the NHS there should be more doctors at the surgery. Great attitude and a typical one that suggests the desperate need to adhere to pressure and get building. In my</p>

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				opinion if the government can't sort important problems such as health care to meet communities needs then they should not be forcing councils meet such high housing targets! The planner also mentioned that the highways agency have provided evidence that North Walsham does not suffer traffic issues. This I cannot believe as I have lived in the town and regularly get caught in traffic. Surely there is a point when a town can become to big for it's own good? The only ones to benefit are the landowners, developers and council. Cannot see any benefits for current residents by over building like this. Object to preferred site in North Walsham.
HOU1	Willer, Mrs Jill (1210911)	LP099	Object	I have seen many changes and developments in and around the town. I truly believe that the town has almost reached it's capacity and any new builds should be limited to brown field sites. The number of new builds suggested needs to be scaled down. 2000 plus is unrealistic. We have just had new house builds on the Norwich Road, putting an extra strain on our doctors surgeries, dentists, drainage, water supply and the national grid. How would they cope with the population of another 2000 dwellings? The NHS dentists in the town are no longer taking on new clients, we cannot obtain new doctors due to the work overload and stress of it all! A population increase means more cars commuting to schools. There is suggestion of a new primary school but what of the strain on the high school and college? The town network cannot cope with all the extra traffic. To suggest an increase to the industrial estate with extra units as a solution to the lack of jobs in the town is ridiculous. The days of high employment in the town are long gone with the major employers of the 1970's and 1980's. We will have more houses than ever but less jobs than past times. One of the reasons for Crane Fruehauf closure was because of the poor road network to North Walsham and this has not improved since the closure, 20 years ago. Why not build between Norwich City limits and the NDR first. People need work and the vast majority of jobs are in Norwich. People already commuting between North Walsham and Norwich do not have a good road network (B road). It is immensely busy. More cars would put a strain on this. What about the nature habitat. There are 17 species of bees regionally extinct, 25 types threatened and 31 conservation concern. We will not be able to survive in the future without them and nature. This proposal would see North Walsham expanding out of control over beautiful countryside. With the running out of oil for artificial fertilizers, our future generation will need the land to go back to organic growing in order to feed the population, instead of intense farming. They will need the green belt land that this proposed plan will take. Why should people who have already made there homes in North Walsham, especially on the west side, have to put up with all this disturbance and destruction over many years.
HOU1	Philcox, Miss Charlotte (1210047)	LP026	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> If it is to occur, such a large influx of homes for North Walsham must surely be targeted to those in need, not be simply yet another large estate of flashy, 'executive' style homes which are dependent on car use.
HOU1	Bluss, Mr Andrew (1210045)	LP027	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Cannot see a dentist at my chosen surgery because they have vacancies they cannot fill. Professionals cannot, it seems, be attracted to North Walsham despite the growing number of residents (now and in the future). Planned demographics of

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				the residents due to live in this accommodation, what happens when the need for elderly care is required for those unable to live at home anymore? There is only one nursing home within North Walsham (Halvergate House) with limited availability within the remaining care homes. There is going to be a significant number of people who are going to need specialised care in their later years, putting an extra strain on an already overburdened healthcare system. This is a national problem but little or no provision has been made to account for this.
HOU1	Howe, Mrs Alex (1217494)	LP645	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> There are 22 new houses currently being constructed in the Churchfield development and planning permission exists for a further 28 in the Tilia estate. These houses should be included within the required allocation of 150, reducing the new build requirement to 100. 6. Increasing number of second homes is creating an unsustainable need for new housing stock. Regulation and financial policies should be introduced to limit the growth of second homes, thus reducing the demand for new homes. 4. Ensure that the Church Field and Tilia developments are included in the 150 dwellings sought for Hoveton.
HOU1	Hull, Mrs Alicia (1210435)	LP763	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The pattern of out-of-town car dependent housing schemes, aimed largely for the wealthy and holiday houses and second home owners, with only a few so called 'affordable houses', has been destructive. It has added to pollution and congestion, got rid of green field sites, undermined village communities and made many locals homeless. Change to supporting rental accommodation at reasonable costs, built to minimum construction costs and minimum use of carbon for heating and cooking, and with all costs offset, so there is no overall carbon gain. Use widespread consultation and expert information to help devise the policy.
HOU1	Filby, Mr Michael, Partridge, Mrs Lois (1217056, 1217052 )	LP254	Object	Paragraph 77 of the NPPF states that: 'In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.' Paragraph 78 of the NPPF states that: 'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.' Policy SD3 does make limited provision for new development in Small Growth Villages. The policy states that: 'Small scale developments, including brownfield developments, community facilities and services will be permitted within the defined boundaries of the following Small Growth Villages.' Footnote 11 of the Plan notes that small scale developments are defined as infill development and new allocations of between 0-20 dwellings (to be selected in a Part 2 Plan). The policy goes on to note that: 'Outside defined development boundaries in areas designated as Countryside, residential development will only be permitted where it accords with other policies in this Plan. Or: 1. The proposal is for small scale development of typically no more than 5 dwellings; and 2. The site comprises of previously developed land; and 3. Development of the site would result in infilling or rounding off in a predominantly built up area.'

Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				<p>We strongly suggest that this policy is overly restrictive and does not comply with paragraph 16b of the NPPF, which requires that plans should be prepared positively, in a way that is aspirational but deliverable. It is respectfully submitted that, as drafted, the Plan does not go far enough in enabling villages in North Norfolk to grow and thrive. It is well documented that shops and services have closed in many villages in recent years; this Plan should provide an opportunity to reverse that decline and should not artificially restrict housing to infill or densification in Small Growth Villages which do still have a range of facilities and provide a relatively sustainable location for future growth. Instead, it should provide the opportunity for Small Growth Villages to grow and attract new residents. It should provide a more flexible policy context in which development can be brought forward. Specifically, the existing provisions of the Plan should be replaced by a policy which states that developments of 0-20 dwellings should be permitted on land adjacent to settlement boundaries, or sites which are close to settlement boundaries, and are in sustainable locations.</p> <p>We have reviewed the 23 Small Growth Villages identified in the Plan, and believe that generally sites of twenty properties cannot be accommodated in these villages, where the settlement boundaries are drawn tightly, there is little land availability and there has already been infilling and densification of the existing built form. It is therefore likely that, in order to provide approximately 20 dwellings within the settlement boundaries of each of these villages as required by Policy HOU1, several, smaller sites could be required. Development of several, smaller sites is likely to have a greater impact in terms of impact on amenity on the existing residents and is unlikely to deliver any scale of infrastructure which could make a meaningful contribution to offset the impacts of development. Indeed, it is likely that many of the smaller sites will avoid providing any affordable housing, if they fall below the thresholds for affordable housing provision proposed by the Council in Policy HOU2.</p> <p>We suggest that the Policy should be amended to make provision to allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings. This would help to conserve the existing urban fabric of the villages, and would allow some controlled, sustainable expansion of the Small Growth Villages, which, as identified in paragraph 7.24 of the draft Local Plan, have a number of services, and act as limited service hubs for other nearby villages, thereby complying with the provisions of paragraph 78 of the NPPF. On this basis, my client's sites should be considered for allocation in Roughton. Land north of Chapel Road lies to the west of the existing settlement boundary, in an infill plot between the existing properties along Chapel Road. The Plan affords the opportunity to review the existing settlement and include these properties and my client's infill site within the boundary. The site lies in a highly sustainable location, only some 600m from the village centre and is connected by an existing pavement, enabling residents to walk into the village. Land east of Norwich Road lies adjacent to the settlement boundary, which is formed by the A140, and also lies within walking distance of Roughton's shops and services, and bus stops on the A140. We suggest that the Policy should be amended to make provision to</p>



Draft Policy	Name & Consultee ID	Ref	Nature of Response	Summary of Comments (Individuals)
				allocate sites which are adjacent to existing settlement boundaries, or close to settlement boundaries and in sustainable locations, for up to twenty dwellings.
HOU1	Johnson, Mr & Mrs (1215700)	LP139	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Agree. It is pointless building homes on the coast to serve the local community if they are all snapped up by second home owners. That does not address the needs of the local community. That will just lead to continued demand for more housing. Second home ownership pushes up costs and demand for affordable housing. Second home ownership should be discouraged by charging full council tax, business rates where appropriate and by local occupancy clauses in developments. The acquisition of development sites by individuals for the purpose of second homes should be positively discouraged. There are many examples of homes of this nature on the coast built with inappropriate materials, out of character detailing and inappropriate size. Also too many overdeveloped sites are changing the character of the villages.
HOU1	Griffiths, Mrs Heather (1210796)	LP087	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Concerns about any significant development of new housing in Wells, due to the additional pressure on local infrastructure - particularly parking and the roads. We already have plans in place to restrict parking which means that people cannot park outside their houses. I suggest that we consider 'residents only' parking. I also question whether Wells has the amenities to support much more development. However, I do understand the need for limited development, and affordable housing in particular (which I believe should be restricted to local people only). Assuming that any approved development is sensitive to the local environment and contains all the basic infrastructure, I support the development at sites W07/1 and W01/1 as these would have the least impact on residents of the town and visitors.
HOU1	Dixon, Cllr Nigel (1218612)	LP738	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Stop the loss of housing stock to second, and holiday letting, homes across the District by introducing local primary residential conditions.

Individuals	Number Received	Summary of Responses (Policy HOU1)
Summary of Objections	32	Many commented that the overall housing target was too large and the governments standard methodology was not easily understood or appropriate. Many respondents focused on proposed growth levels in their own towns citing growth was not appropriate for a variety of reasons from lack of infrastructure and service provision , road network, countryside locations and impact on existing views, agricultural production and inadequate employment opportunities as well as affordability issues and the potential to be used as second homes. Some however objected due to the allocations not being large enough commenting that the target was not sufficient and more development should be allocated in the smaller service villages such as Blakeney, and that the small scale target for infill development of 400 was not

		sufficient . Scale of development in North Waltham, Cromer, Hoveton , Wells and South Reps were mentioned specifically as not appropriate, but for a variety of local issues. There was a strong sense that the local plan should only be seeking to meet the housing need locally generated and that the target is objected to because it does not seek to prioritise local occupation. Others however thought that restricting occupation was not enforceable and would not result in any net benefit or affordability and at least eased the burden of growth on the health service and surrounding services.
<b>Summary of Supports</b>	4	Support was expressed where appropriate housing types and where the target could be reviewed or revised in light of more up today household projections . Greater transparency was called for in the over all figure. Support for growth in Beeston Regis to accommodate over flow from Sheringham.
<b>Summary of General Comments</b>	16	General comments also focused on the high housing target and the potential impacts on services and perceived infrastructure limitations as well as percept impact on house prices due to the competing demands of second home owners. Other however supported the need for the target to be used as minimum to provide the appropriate type of housing to meet all needs. some comments focussed specifically resources while others made general comments around the suitability of North Walsham to accommodate such a high level of growth.
<b>Overall Summary</b>		Majority of respondents raised concerns that the housing target is too high and that the District cannot accommodate the proposed level of development due to constraints, lack of infrastructure capacity , road network, service provision etc. and the need to only address locally derived need . However a number of representations argued that the housing target should be considered as a minimum or arguably higher to provide the flexibility to deliver sufficient housing for the recognised need throughout the plan period. There is widespread views that the number of second homes has an adverse impact on the local housing market and in particular prices out local people and limits the type and tenure of properties that are available for local occupation and being built. A number wished to see the introduction of occupancy restrictions, but some acknowledge the difficulty in enforcing them and that they may not improve affordability.
<b>Council's Response</b>		Noted: Consider comments in the finalisation of the policy. The Local Plan seeks to address the Strategic needs of the District which are calculated using a standard methodology set out in national guidance. Local Plans should set out policies in order to address <b>all needs</b> , market, affordable, economic and social in line with national policy. Targets are set out as minimums. Plan making remains iterative and the target will be reviewed in line with evidence and the methodology in future iterations. Full details are published in background paper 1: The approach to setting the Draft Housing target. • Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts and provide flexibility • The distribution of growth is informed by the guiding principles of the NPFF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and be prepared with the objective of contributing to the achievement of sustainable development in a positive way that is aspirational but deliverable. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. • The proposed approach which allows small scale infill development in selected small growth villages which contain some but limited services, the allocation of small scale housing sites and the provision for rural exception sites in areas of designated countryside will be reviewed in line with feedback and evidence of need.

## Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU1	Bacton & Edingthorpe Parish Council (149585)	LP239	General Comments	Concerns re increase in traffic and impacts on quality of life of the parish of bacton including increased visitor pressure on bacton woods/ Witton woods- Inflating housing target in North Walsham just to reach infrastructure thresholds deprives other areas of the District of the ability to address infrastructure deficiency and represents an disproportionate amount of growth in the east. Targeting North Walsham to take so much of the bulk of the housing target, together with a disproportionately high density of growth villages in our part of the district, represents a poor attempt at forward planning, likely to have an unfairly detrimental impact on the geography of this part of the district, and quality of life of existing residents.	Noted: The distribution of growth is informed by the guiding principles of the NPPF , including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing , jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2.
HOU1	Blakeney Parish Council (1215955)	LP272	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Second Homes and change of use from residential to holiday accommodation - We would like these to be subject to a change of use application. Second Homes - We would like to see them levied with a higher Council Tax, which then goes back into the village, towards new affordable housing for local people. New Development - We would like new properties to be solely used as principle dwellings only, no new additional second homes. Local Employment	Noted: Use classification is a matter for law and is outside the scope of current land use planning. The Council is actively supporting the provision of rural exception sites and affordable housing provision through grant funding and working with local communities in the identification of and delivery of sites to address local

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					<p>need. Such sites can also be brought forward through the emerging neighbourhood plan. The use of a second home is not defined in planning legislation, the occupation of residential dwellings is not a matter of land use planning and there are no planning controls that can be utilised to control the use of the existing housing stock as second homes. The approach through national guidance is one where an uplift is applied to the overall housing target to account for those homes lost through second homes ownership. Blakeney is preparing a neighbourhood plan and the Council is supportive of communities utilising these planning powers where there is an opportunity to bring forward additional growth in response to local issues and evidence.</p>
HOU1	Cley Parish Council (1217592)	LP646 LP650 LP655	General Comments	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Need to build 11 k houses to deal with future population growth, but this is largely driven by inward migration, not by growth of the existing North Norfolk population. What do we need to build to serve the needs of the local population? Why aren't we building just to cover these needs? Inward migration may change eg with the economy, so is it wise to base large future housing numbers on this factor? If all these new homes are built, how can the council as it aspires still provide increased access to the countryside and protect the environment? North Norfolk's economy is largely based on tourism, and this will be impacted by the effect of the new housing on our natural surroundings. North Norfolk will be a less attractive place to visit. Also, What about the impact of the new housing on the</p>	<p>Noted: Plans should be positively prepared to meet all development needs as a minimum. The Council is supportive of Local communities bringing forward additional growth to support local identified need through neighbourhood planning. The housing numbers make an allowance for windfall development.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				<p>infrastructure visitors use, eg the roads. - States historically windfall development has provided a substantial number of homes and there is no evidence to say this will decrease, but they are reducing your expectation by 50%. What is the basis for this? Surely windfall development reduces the number of new homes needing to be built. - Healthcare, parking and education are all constraints in Holt. How are these going to be tackled? For instance 330 more homes requires more doctors, how will this be achieved?</p>	
HOU1	Northrepps Parish Council (1218479)	LP789	Object	<p>Members do not support the need for any additional housing in Cromer. If more housing is actually required, brownfield sites should be developed and empty properties brought back into use before any additional housing is considered especially in the countryside and the AONB. • Members noted the comments put forward by CPRE</p>	<p>Disagree: The housing target and distribution of growth is informed by the guiding principles of the NPPF, including the NPPF's aims of boosting significantly the housing supply and with regard to level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. This includes through planning making sufficient provision for housing ,including affordable housing. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
					detail is published in background paper 2. Cromer itself functions as a higher order town and provides significant housing , employment and services to residents of the town and District.
HOU1	Wells Town Council (1212319)	LP098 LP103	Support	The Council accepts the allocation of eighty dwellings for the town as part of its share of government housing requirements for the District. The Council supports the building of affordable housing over the plan period up for the full number remaining as required by the District	Support noted. The Council considers it important to retain land supply solely for employment uses.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU1)
<b>Objection</b>	1	Issued raised include: The over-concentration of growth in North Walsham impacts on the ability of other more remote areas to improve infrastructure, brownfield sites should be used first, growth should be principle homes only and growth is not supported in Cromer. The allocated numbers in Wells are supported. One parish Council questioned the housing number methodology, the impacts of windfall and the effects in service provision.
<b>Support</b>	2	
<b>General Comments</b>	3	

## Policy HOU1 - Housing Targets for Market & Affordable Homes

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU1	Broadland District Council (1216187)	LP171	General Comments	The two mixed use sites proposed for North Walsham NW62 and NW01/B for 1800 and 350 homes respectively could significantly increase the traffic volumes felt on the arterial routes into Norwich, particularly the B1150 and also the B1145/A140 and A1151, as new residents will likely use these routes for both commuting and leisure purposes. Currently, the plan refers to traffic in relation to the town but not more strategically. The Plan should consider and address any potential impacts on these roads; In addition, a strong emphasis should be placed on utilising the existing public transport options available in North Walsham with the aim of relieving this pressure.	Noted: The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan. The Council is working through the Norfolk Strategic Framework and the Duty to co-operate on strategic and cross boundary issues.
HOU1	Broads Authority (321326)	LP806	General Comments	Considering the draw of Norwich to many in Norfolk, there will be increased pressure on roads further from the urban areas, particularly at Hoveton/Wroxham and Coltishall area. It is not clear how the transport impact on an area wider than the immediate locality of the urban areas that are set to grow has been considered. How will this impact be mitigated	The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan.
HOU1	Norfolk County Council (931093)	LP739	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The above upper figure (2016-2036) equates to around 550 dwellings per annum. While the County Council supports	Comments noted. The approach to setting the draft housing target is detailed in full in the background paper

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				<p>the broad housing figures, it is suggested that Local Plan period should be amended to 2018-2036. It is also suggested, for clarification purposes, that there should be further explanation contained in the Plan setting out how the housing figures (per annum) have been derived and how this reflects the Government's methodology. While the County Council supports the broad housing target set out in the Local Plan, it has some concerns with the above approach of not setting a final housing provision target until closer to the Local Plan's submission. This approach creates a degree of uncertainty and the potential for change in respect of site allocations etc. This in turn makes planning for County Council infrastructure difficult. The County Council as with other infrastructure providers needs greater certainty on the level of housing and its specific location in order to be able to plan for its own infrastructure requirements including, for example, transport; schools; libraries etc. 3.4. Therefore, the County Council would like to see further clarification on the level of housing proposed and the derivation of any final housing provision target. The County Council broadly supports the settlement hierarchy (Policy SD3) and distributions of housing growth set out in Policy HOU.1. These comments, however, are subject to the County Council undertaking a further detailed technical assessment of individual site allocations in respect of: • highway/transport matters; and • flood risk/surface water drainage issues. EDUCATION - Children's Services (CS) – The level of housing proposed in the emerging Local Plan (Policy HOU.1) and its distribution, as set out in the Settlement Hierarchy (Policy SD3), does not raise any fundamental concerns to Children's Services subject to securing appropriate developer funding towards the improvement of existing schools or the provision of new school/s through Policy SD 5.</p>	<p>no1 . The Council has engaged with infrastructure providers to establish the current position and capacity and to identify the strategic infrastructure requirements arising from planned growth and to identify potential funding and delivery mechanisms. These issues have been taken into account and will continue to be taken into account through iterative dialogue in the finalisation of the Local Plan Current position is detailed in background paper 4, Infrastructure Position Statement. An Infrastructure Delivery Plan will accompany the final Plan. The Council has used current evidence base and engaged with Children services to identify where additional social infrastructure may be required in order to ascertain the level of support as a result of new development.</p>
HOU1	Gladman Developments, Mr Craig Barnes (1217131)	LP277	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Policy HOU1 sets out that over the plan period the Council will aim to deliver between 10,500 and 11,000 dwellings. Gladman consider that the policy as drafted fails to reflect the approach of national planning policy and as such is unsound. Firstly,</p>	<p>Noted - Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and</p>



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				<p>the lower end of the range identified in the policy at 10,500 dwellings is below the Local Housing Needs assessment currently identified for the District. Though the difference is marginal, national planning policy is clear that the housing need figure indicated by the Standard Method forms the absolute minimum housing requirement; Secondly, the policy is unsound due to the use of the word “aim”. Gladman consider that this language is too loose and departs from national planning policy which is clear that in order to meet the tests of soundness the authority should seek to meet the authority’s OAN. The housing requirement must be expressed as a minimum. It is only where the constraints of the authority area prevent full delivery of housing need should a lower housing requirement be adopted than the standard method. Where this is the case, the Council is required to engage the Duty to Cooperate in order to ensure that any unmet need is accommodated by neighbouring authorities. In the case of North Norfolk, the level of supply planned is above the level of housing need and as such, the constraints of the District do not therefore, in the Council’s view, form sufficient justification not to meet the identified housing need in full. This is confirmed within the Norfolk Strategic Planning Framework with each LPA confirming that they will meet their own OAN - HOU1 sets out the proposed distribution of development across the District. In broad terms, Gladman consider the proposed distribution to be sound. The total level of development proposed at each settlement reflects the position of that settlement within the settlement hierarchy as set out in Policy SD3. Broadly, settlements within the Large Growth Towns are to accommodate a higher level of development than those settlements designated as Small Growth Towns. etc. There are examples of settlements which receive proportionately more or less than other settlements which are included within the same tier. Gladman consider this to be a sound approach taking into account the constraints and opportunities of settlements and their functionality and connectivity with other settlements. In particular, Gladman welcome and support the Council’s proposal for 823 dwellings to be</p>	<p>allocations is provided in future iterations of the emerging Plan. Consider feedback and clarifications requested in the finalisation of the approach including the use of a minimum housing target, the consideration of a 20% buffer in terms of housing numbers and the exclusion of windfall within the first three years of the housing trajectory along with clarification of the expected supply.</p>

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				<p>accommodated at Holt. The level of housing identified for the town reflects its role within the wider rural central part of the District, responsive to the constraints such as the AONB and reflects land availability &amp; opportunities to address existing infrastructure capacity issues. Policy HOU1 advises that part of the housing requirement will be made up from windfall sites. This is permitted by the NPPF where there is a record of historic delivery from windfall sources and policy makers are satisfied that contributions from windfall supply is likely to continue. Gladman do not therefore object to the inclusion of a windfall allowance within the supply provided this is sufficiently justified. A total of 2,295 dwellings is expected by the Council at windfall sites . This equates to an average of 135 dwellings per year representing roughly a quarter of the proposed housing requirement. Evidence illustrating the rate of windfall delivery in North Norfolk is provided within Appendix B of the 2017/18 Interim Statement of Five-Year Land Supply. No detail is however provided to support these figures. It is therefore unclear whether this rate includes garden development now resisted by policy. Gladman acknowledge and welcome the discount made by the Council towards the contribution likely in the future from infill sites, redevelopment and change of use. This rightly recognises the change in local policy which reduces significantly the locations in the District where development would be permitted. Windfall development is however by its nature uncertain and forms a diminishing source of housing land supply. Gladman would expect that as part of the plan preparation process some of these potential sources for windfall may have been assessed and potentially allocated for development through the Draft Plan. The rate of windfall delivery may therefore be expected to automatically reduce over the course of this plan period in comparison to historic levels of delivery. - Indeed, owing to changes in national planning policy, there is now a need to review the potential deliverability and allocate smaller sites through the Local Plan process to provide 10% of the supply on sites of less than 1 hectare . It is however unclear from the Council's evidence how this change in national planning policy has</p>	

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				<p>been considered by the Council in its review of Windfall development. The absence of such a review is a flaw in the evidence given the potential over estimation of windfall supply on account of double counting allocations made through the Local Plan. Notwithstanding the above comments, should the Council apply the suggested change in direction to Policy SD3 in its treatment of development proposals located beyond settlement boundaries as set out in Section 4.2 of this representation, then the prospect for full delivery of the identified windfall allowance would be substantially increased owing to the greater scope provided for windfall development. - Gladman's final concern with the windfall allowance is the contribution made towards the short-term housing land supply. The table shows that a windfall allowance is made from 2019 to the end of the plan period. Whilst windfall development will inevitably occur in the short term, the inclusion of a windfall allowance from year 1 of the five-year period significantly increases the risk of double counting. This is because the committed supply will include sites considered as windfall, but which have yet to deliver. The Council however count the delivery from these sites in its windfall allowance, as well as being an existing commitment for the entirety of the five-year period. The approach is therefore unsound and provides for an artificial and untrue inflation of the housing land supply. The table in Policy HOU1 illustrates that in total a supply of 11,611 dwellings is to be provided over the plan period. This includes contributions made by completions, committed development, allocated sites, and windfall site. Based on the Council's position, 611 dwellings will be delivered in addition to the upper range of the housing requirement. The supply proposed provides a 7% buffer in excess of assessed housing need. Gladman is supportive of the aim of the Council to deliver its locally assessed housing needs figure in full. Gladman however question whether there is sufficient flexibility provided within the supply to ensure full delivery of the housing requirement over the plan period. As set out above, Gladman question whether there is evidence to support the level of windfalls expected by the Council over the plan period. Furthermore, as set out</p>	

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				<p>above Gladman do not believe that it is sound for the Council to include a windfall allowance in each year of the five-year supply. To address this, the windfall allowance should not be included for the first three years of the five-year period, thereby reducing the overall housing land supply by 405 dwellings. A further oversight is the absence of any deduction made to the commitment housing land supply as a result of non-implementation. Gladman consider that it is unrealistic for the Council to believe that 100% of its committed sites will be built as intended. A lapse rate should be factored in and is consistently factored in by other local planning authorities. Research conducted by MHCLG (then DCLG) in 2015 on a national basis suggests that between 10 and 20% of consents are not built out. Taking the lowest end of this range and applying a 10% deduction to the committed supply would lower the supply provided by commitments to 2927 dwellings. Applying the conclusion made above, the supply provided over the plan period is at least 730 dwellings less than set out in the Local Plan, meaning that the supply provided is only marginally above the assessed housing need with only a 2% buffer provided. The above findings illustrate how precarious the Council's housing land supply position is and is arrived at without examining the deliverability and delivery rate of the planned supply (noting the absence of a housing trajectory). Proposed Changes Re housing requirement: the Council should revise the Policy to read, "at least 10,860 dwellings will be delivered over the plan period". This wording makes clear the Council's commitment to meet its housing need in full and wholly reflects the NPPF. Re Windfall Gladman consider that a windfall allowance should not be applied for the first three years of the five-year period. The rationale of this approach is to completely avoid the three-year timeframe within which existing consents can be implemented before they lapse, thereby reducing the potential for double counting. The application of this would reduce the windfall contribution by 405 dwellings based on the Council's current windfall allowance. Re: Supply. in order to secure the deliverability of the Local Plan the amount of supply should</p>	

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				be increased to provide for a 20% buffer against the housing requirement as a minimum. Based on the above position, Gladman consider that there is a need for further sites sufficient to accommodate around 2,150 additional dwellings. The Council should also ensure that a housing trajectory is published as part of the publication version of the Local Plan, to provide transparency on how it assumes the Local Plan will be delivered in order to demonstrate its deliverability and effectiveness.	
HOU1	CPRE (Mr Michael Rayner) (1204056)	LP296	Object	We consider that there is no reason why new sites allocated in the Local Plan should not be phased. They would then be available for development should building rates increase and the vast majority of existing allocated sites are built-out, but if house completions remain at existing rates these newly-allocated sites could stay on a reserve list and valuable countryside would be protected. This would be particularly important if Government predictions of population and household growth are reduced further. We note that a number of proposed allocated sites in the new Local Plan are already in the existing Local Plan. These sites should be prioritised (along with any currently unallocated brownfield sites) to be developed before other newly allocated sites and would not need to be put onto a reserve list. This reserve list would be for sites which have not been previously allocated in the existing Local Plan. Twenty Parish Councils across the District support this proposal as demonstrated by their signed pledges (copies posted to NNDC) as part of the CPRE Norfolk Alliance. Brownfield First. We acknowledge that the NNDC's Brownfield Register has only 9 sites on it for a total of 131 houses. These should be prioritised for development and need not be placed on a reserve list	Comments noted: Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.
HOU1	Holkham Estate (Ms Lydia Voyias, Savills) (1215901)	LP559	Object	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Housing Requirement para 9.16 - the Council has assessed its local housing need to be 543 homes per year which equates to 10,860 homes over the 20 year plan period. Background Paper 1 'Approach to setting the Draft Housing Target' identifies at	Comments noted : Consider comments in the finalisation of the housing targets and site approach to Wells • The distribution of growth is informed by the guiding principles of the NPFF, including

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				<p>Figure 3 that if the 2018 mean affordability ratio is applied to the calculation of the standard methodology the housing needs increase to 553 dwellings per annum, equates to 11,060 homes over plan period. It is stated Council aims to deliver between 10,500 and 11,000 new homes over the period however using the most up to date data it is advised that the Council plans to meet the need of at least 11,060 new homes over the emerging plan period. para 10.63 states that "The Council recognises the importance of maintaining vibrant and active local communities during off-peak tourism months and of striking a balance between providing permanent housing for local people and providing tourist accommodation to support the local community." It is considered that this is a key consideration . It is recommended that a detailed assessment of Tourist Accommodation and the interrelationship with residential properties is commissioned. Housing Supply table at Policy HOU1 suggests that an allowance for approx. 5% buffer (11,611 dwellings compared to up to date need figure of 11,060 homes). It is suggested that the Council increases this buffer through the identification of additional sites for allocation. Position regarding the supply is as follows: • Completions (1st April 2016 to 30th January 2019) = 1,200 dwellings • Commitments (January 2019) = 3,252 dwellings • Total = 4,452 dwellings In order to meet the Council's stated aim to deliver 11,000 new homes it would be necessary to identify new sites to accommodate a further 6,548 dwellings. However the Council is only proposing sites sufficient to accommodate 4,864 dwellings and is reliant on 2,295 dwellings to be brought forward as windfall development. Whilst this allows a degree of flexibility for sites to come forward , there is less certainty about the deliverability of new homes within the plan period. Paragraph 70 of the NPPF makes it clear that the Council needs to have compelling evidence that windfall sites will provide a reliable source of supply and consequently the District has to be realistic in such a position bearing in mind the scale of windfall it assumes will come forward and the importance of such an element as part of housing land supply. It is</p>	<p>that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel. In North Norfolk this necessitates the majority of housing growth is concentrated in those settlements that have a range of services are well connected and have the potential to meet local needs, as well as seeking to deliver more limited growth to the dispersed rural villages of the District. Overall numbers are influenced by local factors including environment constraints. Further detail is published in background paper 2. * Plan making is iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.</p>

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				<p>requested that the Council produces a Housing Trajectory to demonstrate how and when new homes, commitments and suggested allocations will deliver across the plan period in accordance with paragraph 73 of the National Planning Policy Framework. It certainly remains the case that the provision of new homes is a key priority with the NPPF and as set out in paragraph 59 of the NPPF confirms that it remains imperative that a sufficient amount and variety of land comes forward to meet the Government's objective of significantly boosting the supply of homes. In order to provide increased certainty it is requested that the Council reconsiders the potential Land south of Warham Road, Wells-next-the-Sea (Site Ref: W11) for mixed use development comprising 50 dwellings and some light industrial commercial workspace. The Large Growth Towns are anticipated to receive 47.12% of all growth. In comparison, the Small Growth Towns are only anticipated to receive 17.04% a much smaller proportion of growth particularly when compared to the expected 19.76% growth to come forward as windfall development. Paragraph 6.8 of the Background Paper 1 'Approach to setting the Draft Housing Target' states "At any given time, between 8% and 11% of dwellings in North Norfolk are not available as permanent dwellings, although this figure is much higher in many of the coastal communities between Sheringham and Wells." This suggests that there may be a need to specifically increase the amount of housing directed to Wells-next-the-Sea to meet the needs of local people. It is requested that the Council reconsider its approach to housing distribution at Wells. In addition, the Council's Background Paper 2 'Distribution of Growth' states: "At a local level, 915 people on the housing waiting list have expressed a preference for living in Wells-next-the-sea, of which 55.19% require a 1-bed property with a further 28.96% requiring a 2-bed property. There are a total of 134 people on the housing waiting list with a local connection to Wells-next-the-sea and 76 people who currently live in Wells-next-the-sea. Of these two groups the vast majority, 49.25% and 52.63% respectively, require 1-bed properties." (Page 54) Despite the above suggestions that there is a need for more</p>	

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				<p>housing to be directed to Wells, the Council notes that the settlement is constrained by environmental considerations which has influenced the Council's approach to the distribution of housing at Wells. Whilst we acknowledge there may some environmental constraints, we also consider that the site put forward by the Holkham Estate at Warham Road can be designed in such a way to minimise its impact bearing in mind the sensitivities of other edges of the town which in our view have more significant impacts. In such a context, it is noted that the majority of ecological designations are situated to the north of Wells. The Council's current evidence base, HRA recognises that further assessment of all the proposed allocations is required going forward. If it is found that Wells is capable of accommodating additional development it should do so to better respond to the need for housing and to seek to reduce the impact of residential properties being used as holiday accommodation. We consider that the reference should be made to "approximate" number of dwellings within the table in HOU1. In respect of Wells, the Council is asked to consider more dwellings in the town and which is our view would not impact upon the broad thrust of the polices in the plan.</p>	
HOU1	<p>Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning)</p> <p>(1218427, 1218424)</p>	LP746,LP755	General Comments	<p>Paragraphs 9.7 and 9.8 Consistent with our comments on policy SD3 above it is considered that the Local Plan should allow for infill housing. The safeguards imposed by the criteria from Policy SD3 together with other policy controls will be sufficient to control against inappropriate or harmful developments. They would however enable and encourage the provision of modest infill schemes of housing which could help sustain existing small settlements and support local service provision in an area characterised by a dispersed pattern of development and variable levels of service provision. It is also consistent with the Government's support, through paragraph 68 of the NPPF, for small sized sites which can be built-out relatively quickly</p>	<p>Comments noted : Development is directed towards the selected settlements outlined in SD3 • The distribution of growth is informed by the guiding principles of the NPPF, including that of supporting rural economy, including the level of services and facilities, the recognition of the intrinsic character and beauty of the Countryside and the overall objective of sustainable communities by locating housing, jobs and services closer together in order to reduce the need to travel.</p>



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HOU1	Rentplus UK Ltd (Mrs Meghan Rossiter, Tetlow King Planning)  (1217083, 1217080)	LP262	Support	We support the Council in setting a separate minimum target for the delivery of affordable housing over the Plan period through Policy HOU 1. This will assist the Council in monitoring and targeting any actions required to boost delivery, should supply fall below expectations in the future.	Support noted
HOU1	Hopkins Homes (Mr Alex Munro, Armstrong Rigg Planning)  (1218489, 1218491)	LP803	General Comments	The housing target for the plan period is described by Policy HOU1 as being "between 10,500 and 11,000 new homes over the plan period". This is based on a figure derived from the District's annual local housing need of 543 dwellings per annum, resulting in a precise requirement for the 20-year plan period of 10,860 dwellings. As a start point paragraph 60 of the NPPF states that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance...". To this end, the use of a range to describe the housing target for the plan period, starting at 10,500 dwellings, conflicts with the requirement of the NPPF that the local housing need of 10,860 should be a minimum. Secondly, the Council's own evidence base (Background Paper 1: Approach to Setting the Draft Housing Target, Figure 3) describes that, using the most up-to-date affordability ratio for the District, the annual local housing need figure actually increases to 553 dwellings per annum, resulting in a revised requirement for the 20-year plan period of 11,060 dwellings. To ensure that the Plan complies with the NPPF and plans for the delivery of this number of homes as a minimum this figure must comprise the lowest end of the range forming the District's housing target. It is also noted that the Council's adoption of the raw local housing need figure as the housing requirement for the plan period fails to consider any additional economic or social factors that may necessitate an additional uplift in the target. Paragraph 2.11 of Background Paper 1 states that "the Council has concluded that because of the large size of the uplift resulting from Stage 2 of the standard methodology, further upward	Comments noted :Phasing Plan making is Iterative - Housing Trajectory and Phasing is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider comments in the finalisation of this policy.

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				<p>adjustments beyond the OAN requirement are neither necessary or supported by the evidence". Whilst we acknowledge that the local housing need figure already includes an adjustment to account for affordability issues of approximately 35% this in-built uplift is purely intended to balance existing pressures on the local housing market – it responds to current market conditions only. It does not therefore account for any future increase in housing demand because of economic growth strategies, unmet needs in adjacent districts or the requirement to meet affordable housing targets. Whilst the baseline housing need set out in the Council's Strategic Housing Market Assessment (SHMA) has since been superseded by the local housing need figure the document's assessment in relation to market signals uplift therefore remains relevant. Figure 96 of the SHMA identifies that, above and beyond demographic projections, an upward adjustment of 593 additional dwellings will be required prior to 2036 to allow a balancing of supply to account for the Norwich City Deal as well as broader market signals. Added to the updated baseline local housing need figure this would result in a revised housing target for the plan period of 11,653 dwellings. To this end Alternative Option 2 (HOU1B), referring to a housing target of 12,000 dwellings, should be included in the Plan to adequately address the objectively assessed needs of the District. Housing supply Firstly, and most fundamentally, it is noted that the supply across all sources detailed in Policy HOU1 amounts to 11,611 dwellings for the plan period. This figure falls below both the revised housing target of 11,653 set out above as well as the rounded target of 12,000 homes described by Option 2 of 'First Draft Local Plan (Part 1) Alternatives Considered' background paper. Allied with a significant reliance on unidentified windfall sites – 2,295 dwellings, or approximately 20% of supply – it is clear that there are sufficient grounds for concern that the plan presents no certainty that the minimum housing requirement can be achieved. This shortcoming should be addressed through the inclusion of additional demonstrably deliverable allocations across the District within both the LPP1 and forthcoming LPP2. We also have specific concerns in respect of the</p>	

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				<p>ability to achieve a minimum of 2,150 new homes at North Walsham by 2036, a figure which represents approximately 40% of all new homes to be delivered by way of new allocations. We understand that significant concerns are harboured by members of the development industry and Officers alike who universally regard the target for North Walsham as challenging. Growth at the town is to be delivered across two substantial sites of 350 and 1,800 dwellings respectively. The respective draft policies covering each site require the preparation of a comprehensive development brief to lead the schemes, to be agreed by the Council before any permission can be granted. The brief for the 1,800 dwelling site must also be subject of its own separate public consultation. Unusually for a comprehensive draft plan the LPP1 is not currently supported by any form of suggested housing trajectory demonstrating the rate at which new homes will be delivered at these sites or across the District as a whole. This conflicts with the requirements of paragraph 73 of the NPPF, that strategic policies should include evidence illustrating the expected rate of housing delivery over the plan period. Lack of such a trajectory suggests that the Council are not entirely confident in the ability of some of their sites to deliver within the plan period. . In the absence of the Council's own projections we have undertaken our own analysis of delivery at the North Walsham sites to understand how realistic the estimation is that over 2,000 homes can be delivered at the town by 2036. In terms of timescales, and drawing on the same evidence as before, we would anticipate that it is highly unlikely that first completions will take place on site until at least 2027. This accounts for the time taken to agree the development brief, the gestation period of any planning application and the delivery of up-front infrastructure.</p> <p>In respect of delivery it is once again expected that market interest in the site will be low. The up-front infrastructure cost will inevitably be substantial and the likely timescales until first delivery will require a significant level of developer commitment and faith in the continued buoyancy of the local housing market to see the project to fruition. At</p>	

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				<p>most we do not consider that more than two developers will be on site at any one time due to the presence of the other North Walsham allocation, with each developer delivering at a similar rate as stated above – approximately 40 dwellings per annum totalling 80 dwellings per annum across the site. This build rate would therefore represent a significant shortfall in delivery over the plan period, of just over 1,000 dwellings. The LPP1 is proposing a level of growth at North Walsham that is entirely unrealistic and certainly more than the market can accommodate. Based on our assumptions that first delivery will take place at the town in 2025 this would require the completion of 195 dwellings per annum across both sites. The average rate of completions at the town over the last 6 years is 56 dwellings per annum.</p> <p>On the basis that an individual housebuilder delivers at the rate assumed by the Council’s most recent Housing Land Supply Statement (June 2018) – that is a maximum of 40 dwellings per annum – this would require the involvement of a minimum of 5 separate developers active at the town at any one time. This scenario in itself is entirely unrealistic considering both the low numbers of volume housebuilders active in the District and the level of competition this would create at the town.</p> <p>Our client therefore has concerns that the Council’s heavy reliance on delivery at North Walsham will result in a significant deficit in housing supply across the plan period as a whole. Our estimate is that this would be in the region of 1,000 dwellings. In addition, neither site should be relied upon to contribute towards the delivery of new homes during the first five years of the plan period due to the extensive lead-in time prior to first completions . Suggested amended policy wording</p> <p>To ensure that the LPP1 plans for the correct level of housing need across the District the housing target should be revised and the first paragraph of Policy HOU1 amended to read as follows:  “The Council will aim to deliver between 12,000 and 12,500 new homes over the plan period 2016-2036. A minimum of 2,000 of these</p>	

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				<p>will be provided as affordable dwellings. To achieve this specific development sites suitable for not less than 5,250 new dwellings will be identified as follows..."</p> <p>This includes a requirement to deliver a further 750 dwellings on new allocations across the District to account for the uplift.</p> <p>In addition, the distribution of development should be amended to take into account the likely deficit in delivery at the North Walsham Western Extension. This would result in around 1,000 dwellings being redistributed across all other settlements in the hierarchy.</p> <p>Proportionately, the requirement to deliver 1,750 additional homes across the remainder of the settlement hierarchy, away from North Walsham, would require approximately 150-200 homes to be delivered by way of allocations across the 15 most sustainable Small Growth Villages identified earlier in this submission</p>	
HOU1	<p>Norfolk Coast Partnership, Ms Gemma Clark</p> <p>(1217409)</p>	LP517	General Comments	<p>9.8 The Norfolk Partnership have undertaken a study of the issues of second homes which is available. A high proportion of second homes does affect the vibrancy and sustainability of local communities and we suggest that there is a policy restricting numbers of second homes, as has been implemented elsewhere in the country.</p>	<p>Comments noted: Occupation of homes is not a matter for land use planning and there is no justification for the limitation of occupation in national planning policy.</p> <ul style="list-style-type: none"> <li>• Other policies actively support the provision of rural exception sites and affordable housing provision through the delivery of sites to address additional identified local need in neighbourhood plans and through community land trusts</li> </ul>
HOU1	<p>Larkfleet Homes, Miss Charlotte Dew</p> <p>(1217517)</p>	LP682	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Larkfleet comment that regardless of the uncertainty regarding the figures of housing need and supply, North Norfolk still require new development to support the distribution of growth within the region. They comment that the background paper 1 (Approach to Setting the Draft Housing Target), submitted as evidence for the DLP suggests the new Plan requires the consistent delivery of around 550 dwellings per annum (somewhat lower than the SHMA figure) and comments that the deliverability of this figure has rarely</p>	<p>Comments noted.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				been achieved in the past. Whilst the Council considers that the figure of 550 units per annum is appropriate bearing in mind the use of the Standard Methodology, this is likely to change as the Government has indicated it will amend it shortly.	
HOU1	Persimmon Homes Anglia (Mr John Long, John Long Planning Ltd) (1216065 & 1216066)	LP161	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Persimmon Homes (Anglia) suggests that the DLP's approach to only deal with the Objectively Assessed Housing Needs (OAN) plus the affordability adjustment is perhaps a little conservative, given the identified housing need in Hoveton; second homes rates in the district; the need to support employment growth; and the potential for certain settlements to accommodate 'cross boundary' growth needs, where settlements are more constrained, for instance Wroxham. Persimmon Homes (Anglia) suggests that the Plan should be accommodating around 40% more than the projected household formation/demographic based requirement, rather than the current 35%. This additional 'buffer' would help to further mitigate the impact of second homes in the area; provide opportunities to meet cross boundary growth needs; assist with dwelling affordability and take account of changing affordability ratios; help deliver additional affordable homes; and address the potential needs of a growing workforce. It would also act as a 'buffer' should identified housing sites/windfall etc. not come forward at the anticipated rates.</p> <p>Persimmon Homes (Anglia) accepts that the Plan, as explained by the Background Paper, seeks to address the District's Objectively Assessed Housing Needs (OAN) in full, with an adjustment for affordability. Persimmon Homes (Anglia) also accepts that the Plan's final housing target is not yet finalised.</p>	Noted: Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. The Council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.
HOU1	Richborough Estates (Mr Tom Collins, Nineteen 47)	LP662	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Richborough Estates support the approach to focusing development on North Walsham, as the largest and most sustainable settlement, but a wider range of allocations are required</p>	Disagree. The development brief for the SWE will provide further certainty on delivery. Plan making is iterative - Housing Trajectory and Phasing is beyond the

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	(1217387 & 1217389)			to reduce the risk arising from over-reliance on a single Sustainable Urban Extension to deliver the significant majority of housing.	scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan.
HOU1	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is acknowledged that the housing need figure for the District accords with the national standard method (543 dwellings per annum); supports consistency with the national Standard Method and supports the provision of at least 680 new homes at Fakenham. 2.2.15 However, the total growth at the Large Growth Towns (5,471 homes) falls slightly under the majority (as noted in Policy SD3) given that the Council aims to deliver 10,500-11,000 new homes. The proposed allocations, such as site F03, will therefore be necessary to meet the housing need in these towns. The impact of windfall sites is unclear and should not be relied upon – further clarity and evidence should be provided regarding windfall sites, consistent with NPPF paragraph 70.	Support noted. Consider feedback and clarification on windfall requested in the finalisation of the approach
HOU1	Firs Farm Partnership (Ms Becky Rejzek, Lanpro)  (1218497 1218496)	LP805	General Comments	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard national methodology. We note the Council's concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and "this figure has rarely been achieved in North Norfolk" (paragraph 6.14, Background Paper 1). In our view this makes the identification of an adequate range of sites, particularly smaller sites within the Small Growth Villages like Sutton all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront	Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan

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				<p>infrastructure before house building can commence. Therefore, we consider it is important to allocate a sufficient number of smaller sites and this site at Sutton is immediately available and deliverable to help meet this requirement. Furthermore, we consider that the Council should treat the 10,500 – 11,000 homes as a minimum number to be exceeded in terms of identifying an appropriate number of allocations.</p>	
HOU1	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP620 LP622	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> Provides the framework for housing delivery through the Plan period and identifies the C10/1 allocation. As per our response to policy DS 3, we support the identification of site C10/1, land at Runton Road / Clifton Park, Cromer. Further evidence to support the delivery of site C10/1 is included in the accompanying Delivery Statement. Supports the Plan’s aim to address the Objectively Assessed Housing Needs (OAN) in full. However, the Council may wish to consider whether a further uplift is required, given the identified housing need in Cromer (1,479 people on the housing waiting list expressing a desire to live in Cromer); second home rates in the district, the need to support employment growth in North Norfolk and the wider area; the need for the plan to take account of the latest affordability ratio (2018) published earlier this year; and to potentially address the under delivery that has occurred in previous years . Whilst we note that the Plan’s housing target is not yet finalised, and some of these issues may be taken into account as the Plan progresses, the Council may wish to consider whether an uplift of 40% more than the projected household formation/demographic based requirement would be appropriate, given that this is a relatively modest increase above the 35% uplift currently proposed. This additional ‘buffer’, would help to further mitigate the impact of second homes in the area; assist with dwelling affordability and take account of changing affordability ratios; help to deliver additional affordable homes; and address the potential needs of a growing workforce within North Norfolk and neighbouring authorities, including potentially North Norfolk’s contribution to help</p>	Support noted. Consider comments in the finalisation of the policy. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.



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				<p>meet the Norwich City deal, if the uplift in housing numbers to support the City Deal cannot all be met within the Greater Norwich area. It would also act as a further 'buffer' should identified housing sites/windfall etc., not come forward at the anticipated rates; and potentially to take account of previous housing under delivery. A 40% uplift would equate to 563 new homes per annum (11,260 over the Plan period), which would help to bring the housing requirement more in line with the Strategic Housing Market Assessment (2017) figure of 574 dwellings per annum, which the SHMA suggests could be required to plan for growth arising from the Norwich City Growth Deal. We have also reviewed the Background Paper 2 Distribution of Growth. Pigeon supports the Council's assessment of Cromer as contained in the Plan and background material. Cromer provides a range of services, facilities, and a considerable range of job and leisure opportunities sufficient to meet the day to day needs of residents and visitors without the need to travel long distances, particularly by the private motor car. Walking, cycling and public transport are all viable options for travel for people to meet their day to day needs, with many of Cromer's services, facilities and opportunities within walking and cycling distance of all parts of the town; and for travel beyond the town, regular bus services are available to Holt, Sheringham, North Walsham and Norwich; and regular train Services are available to Cromer, Sheringham, North Walsham and Norwich. As such we support the growth target for 909 new homes in Cromer over the plan period (592 on new allocations). However, as per our response to policy SD3, the Council may wish to consider whether more growth should be directed to Cromer given the extensive employment opportunities in the town (including the headquarters of North Norfolk District Council, which is a significant employer) and the number of people on the Council's housing waiting list who have expressed a preference for living in Cromer. Notwithstanding, the comments above, we confirm that land at Runton Road/Clifton Park (site C10/1) is capable of delivering approximately 90 homes as part of a mixed-use scheme that will contribute to the housing target set out</p>	

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				within policy HOU1, as set out in the Delivery Statement that accompanies this submission.	
HOU1	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>Paragraph 9.16 states that its local housing needs assessment is 543 homes per annum - 10,860 homes over the plan period. On the basis of this level of housing needs the Council have set a housing requirement in HOU1 of between 10,500 and 11,000 new homes between 2016 and 2036. Whilst we consider the Council to have applied the standard method correctly, we note that this assessment uses the median affordability ratio from 2017 rather than the 2018 ratio that were published earlier this year. We would agree with the later assessment of needs and it will be important that the Council plan for this higher number. PPG states that Councils can rely on this figure for two years following submission. However, if further evidence is published prior to submission the Council will need to reconsider is housing needs to ensure consistency with paragraph 60 of the Framework and its associated guidance. The Council recognise in the local plan that the standard method results in the minimum level of housing needs. Councils must therefore consider, as established in paragraph 60 of the NPPF and paragraphs 2a-010 and 2a-024 of PPG, whether the level of housing delivered will need to be higher in order to:</p> <ul style="list-style-type: none"> <li>• Address the unmet needs arising in neighbouring areas;</li> <li>• Support the delivery of growth strategies or strategic infrastructure improvements; and</li> <li>• Help ensure the delivery of the Council's affordable housing requirements Unmet needs Whilst it would appear that there are no unmet needs within neighbouring authorities at present it will be important for the Council to continue to monitor this situation through statements of common ground. Should it become evident that there is likely to be unmet needs arising within any neighbouring areas the Council will need to consider increasing its housing requirement. Economic growth. Paragraph 9.17 has considered whether employment growth within the Borough will require in uplift to the baseline housing needs assessment resulting from the standard method. The Council note in 'Background Paper 1' that they do not expect economic activity to</li> </ul>	Noted - Plan making is Iterative -Housing Trajectory is beyond the scope of this consultation document and will be addressed once more certainty over the overall housing target and allocations is provided in future iterations of the emerging Plan. Consider feedback and clarifications requested in the finalisation of the approach including the use of a minimum housing target, the target for affordable homes, windfall assumptions and the consideration of a 20% buffer in terms of housing numbers.

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				<p>change over the plan period. However, the Council continue to seek increased economic activity through the allocation of an additional 93 ha of employment land in policy ECN1, which when developed will generate a substantial number of new jobs. The Council will need to consider the impact of these allocations on jobs growth in North Norfolk and the whether an uplift in the Council's housing requirement is needed to ensure there are sufficient working age people to support these aspirations. Alongside this the Council will need to consider the areas ageing population and the fact that this sector of the population will lead to a shrinking workforce and potentially increase the need for housing growth beyond the established baseline. The Council outline in HOU1 their intention to deliver a minimum of 2,000 affordable homes over the plan period. What is not clear from the Local Plan or the Council's evidence base is whether this level of delivery will meet the affordable housing needs for North Norfolk. The Central Norfolk SHMA identifies the need for 17,450 additional affordable homes between 2015 and 2036. However, we could not find within the SHMA a separate breakdown of the need for affordable housing within each LPA covered by this assessment. The Council must state how many affordable homes are needed during the plan period to meet its own needs and the degree to which its proposed housing requirement and affordable housing policies will meet this need. If affordable housing needs are not being met in full then the Council will have to consider increasing its housing requirement to better meet affordable housing needs as mandated by paragraph 2a-024 of Planning Practice Guidance. Recommendations</p> <p>Firstly, any housing requirement must be stated as a minimum to ensure that this figure is not seen as a cap beyond which further development should not be delivered. Secondly, further evidence will need to be provided with regard to affordable housing needs and economic growth and whether either of these factors will require the Council to increase its housing requirement in HOU1. Housing Supply (HOU1) Policy HOU1 sets out in table 1 that the Council expects to deliver 9,316 new dwellings through existing permissions and new</p>	

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				<p>allocations. In addition to this supply the Council expects a further 2,295 homes will be delivered through windfall sites delivering a total of 11,611 new homes across the plan period. Whilst the HBF does not comment on the deliverability of specific sites we do consider it important that reasonable assumptions are made with regard to the deliverability of allocated sites and that windfall assumptions are justified. Whilst the Council will be aware that paragraph 73 the 2019 NPPF requires Local Plans to include a housing trajectory we also consider it helpful to include within the plan, or supporting evidence, detail of how each allocated site delivers over the plan period. In our experience this helps not only those commenting on the local plan but also the inspector tasked with examining it. Windfall The NPPF allows windfall to be included in anticipated delivery where there is compelling evidence that they will form a reliable source of supply. The Council's statement on five-year housing land supply indicates that the level of windfall is expected to be 135 dpa. This accounts for 22% of the homes expected to be delivered over the remaining plan period - 2019 to 2036. Whilst we recognise that delivery on windfall sites has been high in previous years the plan should be seeking to reduce the level of windfall and increase the number of small site allocations within the local plan in line with paragraph 68 of the NPPF. This requires the Council to identify in the development plan sites of less the 1ha that will deliver a minimum of 10% of its housing requirement. We would therefore recommend that the Council seek to allocate smaller sites across the Borough and reduce the level of windfall expected to come forward. This would provide greater certainty in the delivery of new homes with North Norfolk and allow any windfall to be considered a bonus rather than a necessity. Flexibility in supply The Council's proposed supply indicates that the Council have 5.5% buffer across the plan period. This is insufficient and provides limited flexibility within supply should any of the proposed allocations not come forward as expected. We would suggest that the Council needs to allocate further sites and reduce its reliance on windfall. We generally recommend that Councils identify</p>	

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				<p>delivery (including windfall) for at least 20% more homes than the stated housing requirement. Recommendations Whilst the Council states it has sufficient supply to meet its housing needs over the plan period, we do not consider there to be a sufficient buffer to for such a statement to be made with any certainty. At present the Council is reliant on high level of windfall to come forward in order to meet needs and has limited flexibility should delivery not come forward as expected. We would therefore suggest that the Council allocates sufficient sites to ensure a 20% buffer across the plan period to provide the necessary certainty that its housing needs will be met.</p>	
HOU1	Glavenhill Ltd (Hannah Smith, Lanpro) (1218811)	LP736	General Comments	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The overall housing requirement of between 10,500 and 11,000 new homes within the plan period is supported by Glavenhill Limited together with the methodology for calculating this number as set out within Background Paper 1 – Housing Numbers. It is noted that the overall number has increased following calculation of the requirement via the standard National methodology. Glavenhill note the Council’s concerns regarding the ability to deliver this higher target of housing. Hitting the target will require the consistent delivery of around 550 dwellings per annum and “this figure has rarely been achieved in North Norfolk” (paragraph 6.14, Background Paper 1). As such, and in order to give the Council the best chance of meeting its identified housing needs, Glavenhill consider that the Council should allocate sufficient sites to meet a minimum of 10,500 – 11,000 homes over the plan period. Furthermore, the setting of this target makes the identification of an adequate range of sites, particularly smaller sites within the Small Growth Villages like Badersfield all the more important. These sites can generally deliver housing faster than large scale housing sites which may require significant upfront infrastructure before house building can commence.</p>	<p>Support noted. Consider comments in the development the policy approach. The Draft Plan seeks to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan. Alternative site suggestions put forward will be considered in future iterations of the emerging Plan</p>
HOU1	WSP Indigo, Miss Emily Taylor	LP632	Object	<p>In the context of the national housing shortage, with a need for as many as 340,0001 new homes to be built per year, there is serious</p>	<p>Consider comments in the development the policy approach. The Draft Plan seeks</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
	(1217127)			<p>and immediate pressure on Local Planning Authorities (LPAs) to deliver adequate amounts of land for housing. The housing need in North Norfolk has increased substantially compared to its historic requirement and levels of delivery. Previously the Council's Local Plan requirement amounted to 400 dwellings per annum. The Local Plan Part 1 identifies a housing need for 550 dwellings per annum, which is some 30% higher than the adopted Local Plan requirement. The significance of this increase is apparent in the Council's net additional dwellings as calculated in the Government's latest Housing Delivery Test results. North Norfolk District Council (NNDC) has delivered a total of 486, 442 and 555 dwellings over each of the past three years, only once meeting the target of 550 set in the emerging Local Plan. Clearly, it will be difficult for the Council to consistently meet this uplift unless the Local Plan adequately addresses this issue. The Draft Local Plan Part 1 identifies total growth, including allocations and windfall, to deliver 11,611 dwellings against a requirement of 10,680 dwellings based on the standard methodology. However, the Council states that it 'will wish to carefully consider the deliverability of the final housing target before submitting the Plan for examination'. This is not a reassuring stance to take and should be addressed by providing an adequate 'buffer' of suitable sites for development in the Local Plan, which will mitigate constraints to delivery. The Council is currently not identifying enough land for housing to ensure that a consistent rate of delivery is achieved across the Plan period. Paragraph 11 of the National Planning Policy Framework (NPPF) (2019) requires that LPAs should as a minimum meet their Full Objectively Assessed Housing Need (FOAHN) in their Local Plans in line with a presumption in favour of sustainable development. There should be no question of whether the Council is accepting its housing need as defined by the standard methodology given that this is a key feature of national policy and a requirement on all LPAs. The Council should not be challenging the number of homes it is required to provide but should be focusing on being proactive in identifying a considerable reserve of allocation sites to ensure that it does not</p>	<p>to address in full the need for new homes as identified through the governments standard housing methodology. Due to the size of the uplift and the historic provision no further adjustments are considered necessary or supported by evidence. the council will consider this approach along with emerging changes to national policy in the finalisation of the Local Plan.</p>

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				under deliver, especially given its own stated concerns on the rate of delivery. Allowing for a buffer of sites will protect the Council against future uncertainties and risks to the implementation of permissions and allocation sites.	
HOU1	WSP Indigo, Miss Emily Taylor  (1217127)	LP632	Object	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> The Council has not published an up-to-date calculation of its five-year land supply position in light of the new standard methodology target. This is a key flaw and omission in its evidence base and there is no justification as to why the latest supply calculation has not been provided alongside the Draft Local Plan Part 1. We have undertaken independent analysis of the Council's Interim Statement published in June 2018. Given that the Council has not supplied an update now that the standard methodology is established in the NPPF (2019), it is pertinent to consider the Council's supply against the updated housing need figure only. When assessed against the standard methodology figure of 538 dwellings per annum, the Council cannot demonstrate a five-year housing land supply when a 5% buffer is applied, as demonstrated in Figure 1. The Council's capability to provide land for housing declines considerably when higher buffers are applied. This puts immense pressure on the Council for sites to come forward through the Local Plan, given the many variables affecting the calculation of supply. It is essential that the Council identifies sufficient deliverable sites and plans for enough housing to maintain a robust rolling five-year housing land supply (inclusive of a 5% buffer) throughout the Local Plan period. In order to do this, NNDC must identify sites in its emerging Local Plan in sustainable locations that can come forward within the first five years of the Plan. Given that the latest completion data for 2018/19 has not been published, the table below may present a more positive position, particularly if completions for the past year have fallen short of the 538 dwelling target. As Figure 1 shows, the Council can only demonstrate 4.87 years' supply if a 5% buffer is applied. However, this assumes that all 2,837 homes included within the supply are deliverable in the next five years. Based on an initial assessment, we</p>	The Five Year Land Supply Statement 2019 has been published and is available on the Council's website, the Council can demonstrate a 5.73 year land supply.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				do not consider that all of these homes will be delivered in the next five years. Therefore, there is a clear shortage which is likely to be more severe than the shortfall identified using the standard methodology indicates. The Council must identify further sites that can come forward within the first five years of the Plan to rectify this position.	
HOU1	White Lodge (Norwich) Ltd (Ms Kathryn Oelman, Lawson Planning Partnership (1217091 1217088))	LP291	Support	<p><b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> White Lodge (Norwich) Limited are the sole owner of 'the Former Nursery site' identified in Appendix 1. The site, located north of Selbrigg Road and the Cromer Road (A148), in the settlement of High Kelling, occupies a land area just under 1ha in area. The Four Seasons Nursery horticultural business, which previously occupied this land, and has been vacant since 2012, despite being actively marketed as a horticultural nursery. A slightly larger site submitted under 2016 Call for Sites (HKG04), though some areas of the site neither practical or desirable to develop. Considered suitable in HELAA. Evident recently, to remain in line with National Policy not sufficient to restrict development to only handful of larger towns and villages. Quotes paragraph 78 of NPPF. High Kelling has good range of services including post office, shop, village hall and church. Holt hospital to the west of village include; medical practice, pharmacy and dental practice. Easy walking distance from site to these services. Well placed to support Kelling Primary School, 2.6 miles away accessible by bus. Holt is 2.5km away, accessible on foot via a continuous footway along the Cromer and Old Cromer Road, but is more likely to be reached by a small car journey, cycle or bus ride. Range of services in Holt. Plan acknowledges that North Norfolk is a predominantly rural district. Sensible to maintain the vitality of these rural communities by allocating housing development within their boundaries. Allowing those who grow up in these villages a chance to remain. Quotes paragraph 68(a) NPPF. Policy SD3 seeks positively to address this issue by allocating sites of under 1 hectare within the Small Growth Villages and we regard this to be an appropriate solution to meeting the identified housing need. It is therefore apparent that, by locating</p>	Support Noted.



Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				development in High Kelling, this would enhance and maintain existing services in the village and other surrounding villages. Support the principles of Policies SD3 and HOU1, which seek to deliver sustainable development in rural areas and are sound by virtue of their consistency with national policy approach to this issue.	
HOU1	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP581	Support	<b>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION:</b> It is important that the target for the provision of new homes in the District over the plan period to 2036 reflects the most recent housing evidence base and the standard methodology set out in the NPPF. Notably the standard methodology identifies a minimum housing need figure and, as such, the upper threshold of that housing need must be stated within the policy, rather than proposing a range of housing provision as currently drafted. The current draft is at risk of being interpreted as a fixed requirement, which is not in accordance with the standard methodology approach, and should be amended.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU1)
<b>Objection</b>	6	Mixed commentary was received around this policy. In relation to the housing target organisations suggested that wording should be altered to demonstrate that any target is set as a minimum and that the council should aim for the higher end of the range. Most commentary accepted that the approach was in line with the standard methodology, however some challenged the lack of any uplift due to future economic growth. The justification being that an uplift was required to address a diminishing workforce brought on by the aging population and the requirement for further in migration. One comment suggesting that alternative approach HOU1b at 12,000 homes was more appropriate to address the identified OAN. Others however acknowledged the council's position brought on through the adoption of the Housing Standard methodology and recognised the challenges that the preferred option would bring with regard to historical delivery rates and supported the 10,500 – 11,00 homes range provided sufficient allocations to meet it were made. As such some commented that the distribution was considered sound and reflected the position of each town in the settlement hierarchy. Connected to the challenges around the numbers, the council was also challenged around the reliance on large sites growth, commenting that the approach provided little to no certainty that the housing target will be delivered and that the council was not identifying enough land for housing to ensure consistent rate of delivery. A solution suggested further consideration to additional deliverable allocations and a wider
<b>Support</b>	8	
<b>General Comments</b>	8	

		<p>distribution / numbers of adequate sites, particularly in higher valued and rural areas and or a buffer of sites should also be considered. In particular, one developer challenged that the amount of growth proposed in North Walsham was unrealistic and more than the market can accommodate and reliance will result in a significant housing deficit over the plan period. Clarity needs to be given around the expected delivery and housing trajectory</p> <p>The high reliance on windfall development over allocation was also raised as an issue.</p> <p>Some commentary raised the issue that of cumulative impacts on the road network should be taken into further account in the setting of settlement targets</p>
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