

Appendix 1 - Schedule of Representations HOU8-HOU11

Extract of Report of Representations

References to 'OFFICER SUMMARY' indicate that lengthier submissions were made and have either been summarised or separated out into relevant policy or site areas.

The original representation can be viewed in full by searching the LP ref number at: <http://consult.north-norfolk.gov.uk/portal>

Policy HOU8 - Accessible & Adaptable Homes (Regulation 18 Responses)

Individuals

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU8	Mr & Mrs Johnson (1215700)	LP142	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Agree
HOU8	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Building construction must be of the Passivhaus standard.
HOU8	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: All new homes should be built to current 'adaptable house' design standards.
HOU8	Dixon, Cllr Nigel (1218612)	LP738	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Ensure design and build standards require low or neutral carbon footprint energy usage by specifying renewable energy source systems to passive-house standards to address part of the climate change demands agenda and prepare for new regulations which are inevitable during the life of the Plan.

Individuals	Number Received	Summary of Responses (Policy HOU8)
Summary of Objections	1	comments focused around the requirement for higher construction standards (Passivhaus standard)
Summary of Supports	1	One support received.
Summary of General Comments	2	comments highlighted the need to adaptable properties and the requirement to build to low or neutral carbon footprint
Overall Summary		Limited comments received on this policy. Where comments were received they focused on construction standards
Council's Response		Comments noted

Parish & Town Councils

No comments received.

Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU8	Gladman Developments, Mr Craig Barnes (1217131)	LP280	Object	Gladman acknowledge the general need to ensure that homes are provided to meet the needs of a diverse population. As such, Gladman support the Council's aim to ensure that new homes are built to standards which reflects the needs of the population. That said, PPG is clear that optional standards which are to be applied in excess of building regulations need to be sufficiently justified , and as a result evidence is required to justify the level of provision which is proposed. Whilst it is accepted that the population of North Norfolk is to age significantly over the plan period, Gladman question whether this provides sufficient justification to require 100% of new homes to be developed to M4 (2) standards. This is especially the case given that a large part of the housing requirement reflects an uplift made in response to affordability issues. This uplift is required largely to provide opportunity for younger households to form and access the housing market. As such whilst natural growth in population is driven by an ageing population, market transactions will be more mixed. Furthermore, the mix of dwellings provided over the plan period will include types of dwellings which by their character and location would not be suitable for elderly people. It would be inappropriate to require larger dwellings to be provided to accessible homes standards given the under occupation of dwellings this would promote. A 100% requirement is therefore not justified.	Noted Consider comments in the finalisation of the policy. The approach is supported by detailed evidence contained in background paper no 7: Housing Construction Standards published with the consultation documents.
HOU8	Kelling Estate LLP (Mr Roger Welchman, Armstrong Rigg Planning) (1218427, 1218424)	LP746, LP756	General Comments	National guidance advises that local plan policies for Category 3 homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (NPPG Ref ID: 56-009). It would therefore be contrary to national policy to seek a proportion of category 3 dwellings in housing other than affordable housing to which the local authority has nomination rights. In addition national guidance indicates that optional requirements in part M should not be applied to non-lift serviced multi-storey housing developments. The policy should acknowledge that the policy requirements will not apply to such developments above ground floor. A modification is therefore required to the wording of this policy to make it sound	Disagree - national policy may state that optional requirement M4(3) can only be applied where the local authority is responsible for nominating a person to live in that dwelling. The evidence estimates a wheelchair accessibility need (current and future) of approx. 10% of households in order to meet unmet and future need in an affordable property across the District. This could arguably be seen as a lower end of potential need range given the projected large

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					increase in over 65 age cohorts and in particular the over 85s . A policy requiring 5% M4(3) dwellings on schemes of 20 allows for the provision of one full unit in most allocations . Such a provision would fall into the higher affordable housing percentage required in policy HOU2.
HOU8	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP535	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) suggest that Policy HOU8 be revised to provide greater clarity as to whether it requires all residential proposals to include a separate document setting out how a proposal would accord with relevant standards as detailed in Building Regulations, or, whether such a document would only be required when exemptions are being sought. If the separate document is required on all residential proposals (regardless of whether exemptions are being sought), Persimmon Homes (Anglia) would object to this policy on the grounds of it placing excessively onerous requirements upon developers at the application stage. The policy requires compliance with the Building Regulation standards and this mechanism for delivery is considered sufficient without the need to submit additional information at the application stage.	Noted: consider clarification in future iteration of the Plan, regarding whether the separate document is required on all residential proposals (regardless of whether exemptions are being sought). It is considered
HOU8	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP624	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Whilst we support the aspiration of providing homes that will meet the needs of the older population and confirm that this requirement can be accommodated within site C10/1, imposing this standard on all dwelling types (including market homes) may not deliver the required homes in the correct location. For example, an ageing population does not automatically correspond to more households that require accessible homes and often people that require more accessible homes will choose to adapt their existing home, rather than to move to a new build home that has been built to accessible or adaptable standards.	Noted. Consider comments in the finalisation of the policy.
HOU8	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Policy HOU8 requires all new homes to be built to part M4(2) of the Building Regulations and 5% of dwellings on sites of over 20 units to be provide wheelchair adaptable homes in line with part M4(3). When the optional technical standards were introduced the Government stated in the relevant Written Ministerial Statement that their application must be based on a clearly evidenced need for such homes and where the impact on viability has been considered – a position that is now reflected in footnote 46 of the 2019 NPPF – with further detailed guidance being provided in PPG. In addition to needs and viability PPG requires the Council to also consider: • the size, location, type, and	Noted: Noted Consider comments in the finalisation of the policy. Disagree- Background paper no 7 sets out the evidence base for this requirement. The national space standards are intended to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>quality of dwellings needed; • the accessibility and adaptability of the existing stock; and • variations in needs across different housing tenures. The evidence on need provided by the Council in the draft local plan is based principally on the Council ageing population. Yet just because there is an ageing population does not necessarily mean that there is an increase in the proportion of households requiring more accessible homes. For example, the English Home Survey, which examined the need for adaptations in 2014/151, noted that 9% of all households in England had one or more people with a long-term limiting disability that required adaptations to their home and that this had not changed since 2011-12. The survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs. In addition, the survey indicated that those over 65 that required an adaptation to their home were more likely to consider their home suitable for their needs. So, whilst there is an ageing population there may not be a consequential increase in the need for adaptations or more adaptable homes. Many older people are evidently able to adapt their existing homes to meet their needs or find suitable alternative accommodation. A new home built to the mandatory M4(1) standard will therefore be likely to offer sufficient accessibility for the rest of their lives and as such to require all new homes to comply with Part M4(2) is disproportionate to the likely need within the plan period. Recommendation The Council should reduce the proportion of new homes to be provided as part M4(2) as there is insufficient evidence to justify all new homes being built to this optional technical standard.</p>	<p>responding to occupants needs. The population of North Norfolk aging at one of the fastest rates in the country, invoking the minimum national space standard through the Local Plan is also considered to be important in relation to long term adaptability and sustainability.</p>
HOU8	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP309	Object	<p>Policy HOU8 seeks to apply what is already an optional standard, to 100% of new dwellings conform to the requirements of Part M4(2) of the 2015 Building Regulations. This represents a radical and unwelcome approach to addressing an existing shortfall. At present all of Norfolk Homes Ltd.'s open market and shared equity houses comply with Part M 2004 Regulations, which is the same as the current mandatory Part M4(1) 2015 Regulations. Its current Affordable Rented house types are designed to comply with the Lifetime Homes Standards and will satisfy the new Part M4(2), which is what draft Policy HOU8 is seeking to apply. Meeting the requirements for the WC/cloakroom provision on smaller house types is extremely challenging (as minimum finished footprint area requirement is to be not less than 1450 x 1800mm). All 1, 2 and some 3 bed dwelling types will require enlarging/remodelling to achieve this. Further reworking of bathrooms and bedrooms will also be needed. All of which have implications for viability. The second bullet point of Draft Policy HOU8 requires that 5% of dwellings on sites of 20 or more units should be wheelchair adaptable. Whilst Norfolk Homes has already applied this design requirements on existing dwellings (notably at Roughton Road, Cromer), it should be borne in mind that these require larger plot area allocations on a site-by-site basis. Sloping sites will in particular be a challenge, in respect of access</p>	<p>Noted: Consider comments in the future iteration of the Plan as the policy approaches are reviewed finalised and appropriate costs included. The Council have undertaken a proportionate assessment of Plan viability as laid out in the planning practice guidance in order to appraise the impacts of the emerging policies on the economic viability of the development expected to be delivered through the Local plan. This includes an allowance for adaptable and accessible homes (HOU8) a review of elderly accommodation and a 5%</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				and parking. The draft policy should bear in mind constraints such as the topography of a site. Before seeking to apply such a policy across the board, the Council ought to be aware of the practical and financial implications to a housebuilder. Additional work/cost is required by the policy: "All residential proposals should be accompanied by a separate document setting out how proposals (including each dwelling type) accord with each of the standards...". "Applicants must submit appropriate supporting evidence of sufficient details to enable consideration, including a viability appraisal". A requirement for even more supporting documentation is entirely at odds with the Government's state intention of reducing the burden on house builders and ensuring the planning system is quicker, efficient and more responsive in delivering houses. The policy is an example of planning seeking to interfere with issues squarely in the remit of the Building Regulations, and for which a planning policy is entirely superfluous. Planning policies should go no further than being prescriptive on the affordable rented dwellings; everything else should be left to housebuilders, Building Regulations and the market/s in which they operate. An unintended consequence of this policy would be an adverse effect on the provision of smaller dwellings, resulting in fewer being built, and those being more expensive. I believe the problems inherent in the policy are demonstrated by the caveats setting out exemptions and viability constraints (e.g. "Exemptions will only be considered where the applicant can robustly demonstrate that compliance would significantly harm the viability of the scheme" [our emphasis]. Draft Policy HOU8 is excessive, onerous and superfluous. The Council should be cautious in readily dismissing viability impacts: not only would M4(2) and M4(3) increase build costs but in practise likely increase dwelling and curtilage sizes, and thereby reduce build density on site (reducing the number of houses to be built), with various implications	contingencies as standard. Additional costs through increased building regulations and the move toward low carbon homes should be reflected in the Land value as per Government guidance contained in the PPG Paragraph: 012 Reference ID: 10-012-20180724 and NPPF para 57.
HOU8	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Recognises the importance of providing accessible and adaptable homes. The requirement to meet the necessary Building Regulations is supported to ensure homes can be lived in by all members of the community.	Support Noted.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU8)
Objection	2	The council's aim was generally supported across the development industry, but caution was raised as to the justification and application particular across all development. Although the age structure was acknowledged the significant uplift in the housing target in order to address affordability was used to suggest that the approach should not seek higher adaptable standards across all housing and the policy should be reduced to apply to only a proportion of properties. Other comments focused on the Council providing more detail and prescription of the requirements. Norfolk Homes however thought the approach was "an unwelcome approach to addressing an existing shortfall " and an interference with issues that sit with Building Control, though confirmed that their affordable homes already comply to M4(2) and previous developments in Cromer the M4(3) requirement which the policy is seeking to apply,
Support	3	
General Comments	2	

		extending the approach to market housing would utilise extra space and unwelcomed costs. They suggested that the requirements would lead to fewer smaller homes being built and more expensive housing. It was inferred that further consideration of viability and unintended consequences should be looked at in the finalisation of the policy.
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Alternatives

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU8	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).

Policy HOU9 - Minimum Space Standards (Regulation 18 Responses)

Individuals

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU9	Johnson, Mr Jamie (1216384)	LP342	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Although the proposed minimum space standards should be applauded for their benefit to well being and healthy spaces there should be some caveat pertaining to tourist and holiday accommodation which, if in keeping with much of the distinctive historic character holiday accommodation of the area (as highlighted in paragraph 9.61) is often below the figures set out in Table 2 Minimum gross Internal floor areas and storage.
HOU9	Johnson, Mr & Mrs Johnson (1215700)	LP142	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Agree. See comment Not at the expense of HOU6 or ENV policies.

Individuals	Number Received	Summary of Responses (Policy HOU9)
Summary of Objections	0	None received
Summary of Supports	2	Conditional support for the approach - tourist accommodation should not be an exception.
Summary of General Comments	0	None received
Overall Summary		Limited comments received on this policy. Limited comments received on this policy. Where comments were received they focused on support in relation to the benefits of providing healthy spaces to improve well being
Council's Response		Comments noted

Parish & Town Councils

No comments received.

Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU9	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216792)	LP237	Object	The policy as worded is overly prescriptive and places a burden on applicants to provide additional and unnecessary information in support of applications. The 2015 Ministerial Statement set out to simplify the planning process by reducing the amount of supporting evidence required to be submitted by applicants	Comments noted. The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. Being transparent at application stage is an important factor in determination. Consider the inclusion of supporting statement in Design and access statement
HOU9	Larkfleet Homes, Miss Charlotte Dew (1217517)	LP685	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Larkfleet suggest that policy HOU9 should be worded in such a way as to allow flexibility when determining planning applications, as prescribing space standards for homes can impact upon the affordability of such homes. It should be noted that Homes England take a flexible approach to applying the standards in respect of affordable homes. Larkfleet believe the uniform approach of the policy does not take into account the viability on a site-by-site basis. This policy requires additional work and costings as information on how the planning application meets minimum space standards is required for validation.	The provision of sufficient space and storage through the evocation of the Government's minimum space standards in dwellings is an important element of good design, reflects the specific circumstances of North Norfolk and helps to provide the type of homes required. The approach is included in the viability assessment.
HOU9	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP538	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) share the views of the HBF that there is insufficient evidence to suggest that homes slightly below national space standards have not sold or that such homes are not meeting their owner's requirements; <ul style="list-style-type: none"> • Persimmon Homes (Anglia) agree with the HBF that the Council's approach of collating evidence of the size of dwellings completed does not accurately and robustly reflect need, the requirement for which is set out in the NPPG or local demand as set out in the NPPF, and that it would be expected that the evidence base should also take account of market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the 	Noted, consider comments in the finalisation of Policy HOU9. Disagree- Background paper no 7 sets out the evidence base for this requirement. The national space standards are intended to ensure that new homes provide a flexible and high quality environment in line with the NPPF, capable of responding to occupants needs. The population of North Norfolk aging at one of the fastest

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>standards;</p> <ul style="list-style-type: none"> In terms of supporting evidence, the Council's evidence base fails to take account of market information reflecting customer levels of satisfaction for new homes. In neglecting to take account of customer satisfaction levels, Persimmon Homes (Anglia) contend that the Council have failed to demonstrate a need to adopt an internal space standard, as required by the NPPF (footnote 46). Persimmon Homes (Anglia) contend that if a space standard were to be imposed on all new houses, this would inevitably inflate sale prices to take account of increased land take for each dwelling and an increase in construction costs. This is likely to disadvantage those people wishing to get onto the housing ladder with an affordable, high-quality property. 	<p>rates in the country, invoking the minimum national space standard through the Local Plan is also considered to be important in relation to long term adaptability and sustainability.</p>
HOU9	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Supports high quality design that delivers functional and liveable homes; being spacious and well-proportioned is a key tenet of this</p>	Support Noted.
HOU9	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP625	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Whilst we support the policy aspiration to provide high-quality well-designed homes and confirm that site C10/1 can comply with the emerging policy, the implications and potential site-specific circumstances in respect of the policy need to be taken into account. In the absence of specific evidence to justify a blanket approach to minimum space standards, we would suggest that this policy aspiration may be better delivered through a requirement for details of individual dwellings (using the criteria set out in the draft policy) to be provided at the planning application stage to enable space standards to be assessed on a scheme-by-scheme basis. This would also take into account the fact that small houses can also contribute to meeting housing needs and can often be more affordable, helping to increase access to home ownership, in particular for first time buyers. A further consideration that the Council may wish to be mindful of is the implication of the policy on the number of bedrooms that can be provided in a property of an equivalent size if the minimum space standard is applied, with potential implications for overcrowding. For example, a four-bedroom home may become unaffordable to a family that requires that number of bedrooms, if a home that would have otherwise been a small entry level four-bedroom home becomes a large three-bedroom home as a result of the application of the standards. As such the policy could result in market homes becoming less affordable or result in family units occupying overcrowded accommodation, contrary to the aims of the policy. There are also potential implications for affordable housing delivery as a result of the space standards potentially resulting in larger, but fewer, affordable homes.</p>	Support noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU9	Home Builders Federation, Mr Mark Behrendt (1218577)	LP735	General Comments	<p>Minimum space standards (HOU9) proposes to adopt national minimum space standards (NDSS) for residential development in North Norfolk. The Council suggests that the application of these standards will ensure a reasonable level of amenity and quality of life. However, there is no evidence or justification confirming that the introduction of the NDSS will improve the quality of housing or that these will improve the living environment for residents. There is also no evidence presented to indicate that homes slightly below space standards have not sold or that such homes are not meeting their owner's requirements. We consider that additional space does not necessarily equal improvements in quality. There must be concerns that the introduction of the NDSS could lead to people purchasing homes with a smaller number of bedrooms, but larger in size due to the NDSS, which could have the potential to increase issues with overcrowding and potentially lead to a reduction in quality of the living environment. Need is generally defined as "requiring something because it is essential or very important rather than just desirable". The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. The HBF consider that the Council's approach of collating evidence of the size of dwellings completed does not, in itself, identify need as set in the PPG or local demand as set out in the NPPF. It would be expected that the evidence includes market indicators such as quality of life impacts or reduced sales in areas where the standards are not currently being met. There is no evidence provided that the size of the homes being completed are considered inappropriate by those purchasing them or that these homes are struggling to be sold in comparison to homes that do meet the standards. The HBF in partnership with NHBC undertake a Customer Satisfaction Survey annually to determine the star rating to be given to individual home builders. This is an independently verified survey and regularly demonstrates that new home buyers would buy a new build home again and would recommend their homes builder to a friend. The results of the 2017/18, the most up to date information available, asked how satisfied or dissatisfied the buyer was with the internal design of their new home, 93% of those who responded were either fairly satisfied (28%) or very satisfied (65%). This does not appear to suggest there are significant number of new home buyers looking for different layouts or home sizes to that currently being provided. We consider that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. This could lead to a reduction in housing delivery, and potentially reduce the quality of life for some residents. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. Essentially it could mean that those families requiring a higher number of bedrooms will have to pay more for a larger home. The industry knows its customers and what they want, our</p>	Noted. Consider comments in the development of the policy.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				members would not sell homes below the enhanced standard size if they did not appeal to the market. Recommendation We do not consider that this policy is required and that local needs can be met without the introduction of the nationally described space standards. However, if the policy is considered to be justified, we would suggest that the policy is made more flexible to allow for support development schemes including smaller well-designed homes where it is required to make a development viable and deliverable.	
HOU9	Creeting and Coast, Mr John Fairlie (1217414)	LP543	Support	There should not be a requirement for a separate document. For major development, this can be discussed within the Design and Access Statement.	Noted Consider comments in the finalisation of the policy: Consider whether this could be included within the Design and Access Statement.
HOU9	Trinity College Cambridge (Ms Kirstie Clifton, Define Planning & Design) (1210089 1210087)	LP586	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The requirement to meet nationally described space standards is considered to be reasonable and reflects a broader shift by LPAs towards a standardised approach to their housing policy on this matter. The relevant information proposed to accompany development proposals in this regard is also considered reasonable, but it is considered unnecessary to prescribe that this is set out in a separate document (when ordinarily it should be included within a Design & Access Statement), or that this should apply to all applications, as at outline planning stage this information will not be available.	Noted. Consider comments in the development of the policy.

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU9)
Objection	3	Feedback from development industry offered mixed view to the proposed approach. Although high Quality design, functional and spacious homes were supported along with the Council's aspiration some suggested there was no evidence to suggest that adoption of the standards will improve the quality of housing or living conditions and the unintended consequences of people purchasing larger homes but with less bedrooms leading to overcrowding. The HBF point to high levels of satisfaction in internal design of new homes as justification to their general comment as well as raising issues around affordability and that the council's review of size does not reflect need. They suggest that more flexibility is required in the application of the policy around deliverability and viability. Others objected to the requirement to submit a separate document setting out how proposals would comply, suggesting that the requirement was too prescriptive and placed a burden on applicants. Consideration should be given to including this requirement in the Design and Access statement as a solution. Support was also given for the ambition and some advised that the approach was reasonable and support the shift towards liveable homes.
Support	4	
General Comments	1	

Alternatives

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU9	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).

Policy HOU10 - Water Efficiency (Regulation 18 Responses)

Individuals

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU10	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Agree
HOU10	Buxton, Mr Andrew (1218433)	LP761	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Water is going to be in short supply and new developments should in principle rely on existing supplies and not imported water from elsewhere which will become more and more controversial as time goes on. If this constraint reduces the number of new dwellings in N.Norfolk so be it.

Individuals	Number Received	Summary of Responses (Policy HOU10)
Summary of Objections	0	None received
Summary of Supports	1	One supports this policy.
Summary of General Comments	1	One comments that new development should rely on existing supply of water, not imported, if this constraint reduces the number of new dwellings in North Norfolk so be it.
Overall Summary		Limited comments received on this policy. No substantial issues raised.
Council's Response		comments noted

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU10	North Walsham Town Council (1218408)	LP730	Support	We recommend that the 110 litres/person/day is applied across the NNDC	Support for the policy approach is welcomed
HOU10	Cley Parish Council (1217592)	LP653	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Fully Support water efficiency proposal	Support welcomed

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU10	Cromer Town Council (1218420)	LP732	Support	We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.	Noted: Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU10)
Objection	0	Support for prescriptive water efficiency targets.
Support	3	
General Comments	0	

Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU10	Anglian Water (1217129)	LP354	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: We understand that the Environment Agency considers that the area served by Anglian Water is an area of serious water stress as defined in the Environment Agency 2013 'Water stressed areas final classification report'. We would fully support the optional water efficiency standard being applied within the North Norfolk Local Plan area. To support this we are offering financial incentives for residential developers that demonstrate that water use would be 100 litres/per person/per day at the point of connection. As outlined in our current Developer charges the fixed element of zonal charge for water supply would be waived where this can be demonstrated. We are also actively working with developers to install green water systems in new homes including rainwater/stormwater harvesting and water recycling systems. Further details of	Support welcomed: Consider feedback in the development of the policy

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
				<p>Anglian Water's approach to green water proposals is available to view at: https://www.anglianwater.co.uk/developers/green-water.aspx. We would ask that Policy HOU 10 be amended to refer to specific measures which would allow developers to improve go beyond this standard which has wider benefits and that these will be encouraged by the District Council. Proposed that Policy HOU10 be amended as follows: 'For residential development, proposals should demonstrate that dwellings meet the Building Regulation optional higher water efficiency standard of 110 litres per person per day, as set out in Building Regulations Part G2 Water reuse and recycling and rainwater and stormwater harvesting and other suitable measures should be incorporated wherever feasible to reduce demand on mains water supply.'</p>	
HOU10	Natural England (1215824)	LP724	General Comments	<p>We understand that a water cycle study is being prepared to form part of the North Norfolk Local Plan evidence base. This information should feed into the evolving HRA and Sustainability Appraisal.</p>	<p>The Council has worked with infrastructure providers and the EA. to consider constraints and capacity issues including water supply, wastewater and its treatment in the development of the Plan</p>

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU10)
Objection	0	<p>Limited feedback received - No issues raised. Support for this approach was received from Anglian water who provided for consideration some amended wording which would encourage developers to go beyond the national standard which has wider benefits to the District.</p>
Support	1	
General Comments	1	

Alternatives

No comments received.

Policy HOU11 - Sustainable Construction, Energy Efficiency & Carbon Reduction (Regulation 18 Responses)

Individuals

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
HOU11	Addison Elaine (1210267)	LPO75	Object	obligations placed on developers for carbon-neutral developments.
HOU11	Johnson, Mr & Mrs (1215700)	LP142	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Agree. BUT not if the materials used are inappropriate under policy HOU6. Not if materials provide poor durability or high maintenance as that may affect uptake and older people in particular.
HOU11	Mooney, Mr Raymond (1210675)	LP112	General Comments	Whilst supporting the need for a draft plan in order to avoid a piece meal approach to future development. Instead of meeting sustainability for developers and mitigating the environmental impact of the development, there needs to be a much bigger emphasis of reducing, let alone mitigating the environmental impact. Following the declaration by NNDC of a Climate Change Emergency after the draft plan was published. The draft Plan in it's current form is not fit for purpose. To include solar thermal (solar heated hot water), solar PV (electric) air source & ground source heat pumps, and these should be policy requirements for all new builds. Carbon-off-setting modelling for entire project, so that we work towards this whole development being carbon neutral. We are losing a lot of land, we will be generating a lot of greenhouse gases, we must offset this somehow.
HOU11	Rose, Mr Alan (1217227)	LP582	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: New houses should look at using solar and heat pumps and the saving of rainwater for all houses to be used for flushing (WC's), cleaning cars, etc. There could be a central parking area away from some towns such as North Walsham to then use an electric bus into the town centre for shopping or work. This would reduce the environmental impact and also take away a lot of traffic from the town.
HOU11	Drury, Mrs Margaret (1210793)	LP086	General Comments	The policy states that "The above standards should be achieved as a minimum unless, it can be clearly demonstrated that this is either not technically feasible or not viable". I do not think there should be any let out for developers. All new homes should be built to good design and space standards. All should be designed to as near Passiv house standards as possible, with grey water recycling, solar water heating, solar heating and/or ground source heat pumps. Each large site should include some allotments and new planting of trees and wild areas. I am pleased to see electric vehicle charging included.
HOU11	Brooks, Mr David (1217039)	LP251	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Climate change is a major concern so how is the Local Plan encouraging existing and new builds to use Solar Panels and Heat Pumps in order to reduce reliance on fossil fuels?
HOU11	Burke, Mr Stephen (1216753)	LP798	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: • All new homes should be built to the highest environmental standards and energy efficiency, located close to local facilities to minimise car use
HOU11	Hall, Mr Stephen (1215856)	LP223	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Since the start of the plan a Climate Emergency and Zero Carbon targets have been announced the plan needs to reflect these and be more robust in its approach. A move away from Houses with Gas/Oil, installation of solar panels as standard, provision of electric charging points within each residential unit.
HOU11	Hull, Mrs Alicia (1210435)	LP763	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: . I hope your declaring a climate emergency means you will follow the demands of the Extinction Rebellion, to tell the truth, to take action and to support a Citizens Assembly to direct policy. Telling the truth will mean acknowledging the harm done by recent policies, as well as giving full

Draft Policy	Name & Consultee ID	ID	Nature of Response	Summary of Comments (Individuals)
				facts about the costs and benefits of any future plans. Since declaring the climate emergency, all housing needs to be at minimum construction costs and with the minimum use of carbon for heating, and any carbon costs need to be offset.
HOU11	Broadhead, Ms Beverley (1217202)	LP289	Object	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Establishing a 'North Norfolk Rule' for reducing the impacts of Climate Change. The “Merton Rule” was established in 2003 to ensure that all commercial buildings have to create at least 10% of their energy from renewables. This is old hat. Renewables are far less expensive and much more available than in 2003 so such a rule needs both to be upgraded and considerably widened. We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.
HOU11	Bell, Ms Jane (1218416)	LP799	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Strongly support this crucially important policy as a response to paragraphs 9.49 & 9.50. (Paragraphs 9.76 & 9.77 are particularly valid.) However, it lacks equally crucial detail and there is a huge difference between desirability (the auxiliary verb 'should', i.e. 'duty', 'obligation', is repeated) and an enforceable imperative. Suggested Change In practice, are developers going to install, for example, photovoltaic panels and ground source heat pumps? Are they prepared to cover the cost which will have to be passed on to the owner? And what happens if/when it becomes statutory (?) for gas consumption to be phased out? p. 235
HOU11	Green, Mr Stephen (1218541)	LP770	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: All new homes must be carbon-neutral as far as possible. This means: a. they must be able to generate most of their power, heating, and hot water requirements through solar thermal, solar PV, and ground source and air source heat exchangers. These technologies all exist and if they are incorporated into new build their add-on cost is negligible. This will increase demand for local supplies of the necessary products, installers, and maintenance staff, thus creating more local industries and local jobs. b. They must be as well insulated as possible. Probably triple-glazed, and meeting the highest standards of thermal insulation. c. The process of building them must be as low-carbon as possible and any surplus embedded energy must be mitigated. All new homes must be sustainable. This means: b. They must not have gas or oil supplies to them. c. Biomass boilers are not sustainable and must not be installed.
HOU11	Members for North Walsham Gay, Cllr Virginia (1218492)	LP802	General Comments	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: There are useful elements within this policy; in particular, those enumerated within item 1b - “incorporation of measures to maximise opportunities for solar gain through building orientation...” and so on. Just the same, we are not persuaded that the policy is sufficiently demanding. As we have observed elsewhere, North Norfolk has declared a climate emergency. A reduction in CO2 emissions of only 19% below the target emission rate of the 2013 edition of the 2010 Building Regulations would seem a paltry ambition when there are so many examples of Passiv or carbon neutral housing to be found. We believe too that this policy should make provision for schemes of community energy, for example air and ground source heat pumps and photovoltaic panels. We would like to see a higher target for the reduction of CO2 emissions with a requirement for community energy schemes to be designed into new developments of all kinds, whether residential or employment sites.

Individuals	Number Received	Summary of Responses (Policy HOU11)
Summary of Objections	3	Objections received to this policy generally supported it but thought it did not go far enough, considering that the policy could do more to ensure that all homes are of the highest environmental standard and move towards carbon-neutral.
Summary of Supports	1	One specific response supported the policy.
Summary of General Comments	9	General comments supported the need for a policy but a larger emphasis was needed on ensuring developers deliver appropriate and high environmental standards in response to the declaration of a climate change emergency by the Council. All new homes should be carbon-neutral, sustainable, Passive House standards, with solar and heat pumps and grey water recycling and the policy approach should be more prescriptive with developers moving away from reliance on fossil fuel for heating now. Support for Large sites including allotments, planting of trees and wild areas along with electric charging points within each residential unit was clear.
Overall Summary		The policy doesn't go far enough - all homes should be of the highest environmental standard and should be located close to facilities to minimise car use and the policy should be more robust to meet the growing challenges. Should introduce a new North Norfolk Rule. Plan out of date as developed before climate emergency declared. Policy lacks crucial detail to make it enforceable. New homes should be carbon neutral to Passive House standard with solar, heat pumps and grey water recycling and electric charging points. Any carbon needs to be offset. Large sites should have allotments and trees/wild areas. Introduce Park and Ride. Suggest that this policy make provision for schemes of community energy, for example air and ground source heat pumps etc. and like to see a higher target for the reduction of CO2 emissions.
Council's Response		Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to address a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. The Local Plan supports the transition to a low carbon future in accordance with the 2015 written ministerial statement and the Government's new net zero target moving toward net carbon by 2050. Meeting the target by 2050 will require further significant increase in the use of renewable technologies and the switch to low carbon heating such as heat pumps. The Government is consulting (Oct -Dec 2019) on a future homes standard through building regulations that includes options to increase energy efficiency standards for new homes in 2020 and a requirement to ensure future homes to be future proofed with low carbon heating by 2025. Changes in national policy will also need to be considered in the finalisation of this policy.

Parish & Town Councils

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU11	Sheringham Town Council (1217426)	LP548	General Comments	STC would like to see NNDC attempt to reduce the impacts of Climate Change through the planning system. The existing 'Merton Rule' which ensures all new commercial buildings create at least 10% of their energy from renewables is out-of-date. A new rule could set staged targets for efficiencies of energy, carbon removal, water reduction and waste recycling. This new rule could be designed into planning permissions/conditions. • There needs to be an approach to local planning that addresses the Climate Emergency	Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
				<p>that has been declare by NNDC and STC. An environmental impact assessment needs to be conducted and implemented as to the environmental impact of the local plan including the design guides in order to address the concerns of councils and our community, which have led to the declaration of a Climate Emergency. As a result STC expect to see NNDC reduce the impacts of climate change through the planning system. The existing 'Merton Rule', which ensures all new commercial buildings create at least 10% of their energy from renewables is out of date. A new rule could set staged targets for efficiencies of energy, carbon removal, water reduction and waste recycling. This new rule should be designed into planning permissions and conditions. Sheringham Town council expects NNDC to uphold and enforce those climate related principles and rulings in the process of approving planning applications.</p>	<p>take a proactive approach to mitigating and adapting to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole. Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. • The Local Plan is informed by a sustainability appraisal which reviews the key environmental, social and economic considerations that affect the District</p>
HOU11	Cromer Town Council (1218420)	LP732	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The "Merton Rule" was established in 2003 to ensure that all commercial buildings have to create at least 10% of their energy from renewables. This is old hat. Renewables are far less expensive and much more available than in 2003 so such a rule needs both to be upgraded and considerably widened. We argue that the new Local Plan should establish a new North Norfolk Rule. This would set staged targets for efficiencies of energy, carbon removal, water reduction, waste recycling and other aspects of promoting a circular economy over the life of the Plan. The Committee on Climate Change effectively mandates this action. Such a Rule should be designed into planning permissions/conditions.</p>	<p>Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design.</p>

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Parish & Town Councils)	Council's Response
HOU11	North Walsham Town Council (1218408)	LP730	Object	The Town Council also believes that careful attention should be given to roof orientation within the proposed developments in order to maximise the efficient generation of solar energy. We suggest that rainwater harvesting should be required, not simply recommended. Amend Rainwater harvesting: This is the collection of water that would otherwise have gone down the drain, into the ground or been lost through evaporation. Large surfaces such as roofs and driveways are ideal for rainwater harvesting. Generally green roofs do not provide as much harvesting potential as traditional roofing materials, so the use of rainwater harvesting and green roofs on the same building requires careful consideration. This water is not suitable for drinking but can be used for flushing toilets, watering gardens and even supplying the washing machine. Rainwater harvesting has the potential to save a large volume of mains water and therefore help reduce the pressure on water resources. Water butts to supply garden watering requirements are the simplest form of rainwater harvesting system, their installation is required in all new dwellings	Consider comments in the finalisation of the policy.

Parish & Town Councils	Number Received	Combined Summary of Responses (Policy HOU11)
Objection	1	Support for more prescription in setting targets around energy efficiency and carbon reduction in order to address climate change. Objection on the grounds that the policy should be more prescriptive around roof orientation and priority to grey water recycling systems rather than green roofs and water storage/ runoff capabilities.
Support	0	
General Comments	2	

Organisations

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Anglian Water (1217129)	LP355	Support	Anglian Water is supportive of Policy HOU 11 which will help to reduce demand on water resources by demonstrating greater water efficiency.	Support noted
HOU11	Fleur Developments Limited (Mrs Erica Whettingsteel, EJW Planning Ltd) (1216793, 1216793)	LP238	Support	Requirement of separate Energy Statement places a burden on applicants to provide additional and unnecessary information in support of applications. The 2015 written Ministerial Statement set out to simplify the planning process by reducing the amount of supporting evidence required to be submitted by applicants. It is sufficient to include reference to these matters within a Design and Access Statement	Support (partial) welcomed. Consider comments in the finalisation of the policy wording. Consider the inclusion of supporting statement in Design and access statement

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Persimmon Homes (Anglia), Mr Kian Saedi (1217416)	LP541	General Comments	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Persimmon Homes (Anglia) are broadly supportive of Policy HOU 11. However, Persimmon Homes (Anglia) draw attention to the potential viability implications of allowing an adjustment to the 19% reduction in the event of being superseded by national policy or legislation in the future. Development viability is assessed taking account of the measures that would be necessary to achieve the 19% reduction in emissions. If this figure were to change in the future (post plan adoption), it would inevitably carry a cost implication for new development, which, in turn, may carry implications for development viability. Persimmon Homes (Anglia) would therefore expect North Norfolk to consider the potential implications of any future adjustment to the 19% reduction figure and to acknowledge and make provisions for, the associated viability implications within the supporting text of the Policy.</p>	Noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. The Government has recently consulted on moves towards reducing reliance on fossil fuel heat sources and introducing carbon zero homes through building regulations . The consultation document indicates that such additional costs should be borne by the land owner in the price of land. (in line with the NPPF.PPG)
HOU11	North Norfolk Constituency Labour Party (1215750)	LP120	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The North Norfolk Labour Party feel that the current building standards are not of a level that will substantially reduce energy use.</p> <ul style="list-style-type: none"> • New builds should include solar thermal (solar heated hot water), solar PV (electric) air source & ground source heat pumps, and these should be policy requirements for all new builds. • There should be carbon off-set modelling for an entire project, so that we work towards a whole development being carbon neutral. We are losing a lot of land and we will be generating a lot of greenhouse gases, which must be offset this somehow. • There is also the case of our area experiencing ever increasing water stress, therefore, new builds should be designed for maximum water capture and recycling. 	Noted, Consider comments in the development the policy approach. The Local Plan supports the transition to a low carbon future. In accordance with the 2015 written ministerial statement policy Hou11 seeks a 19% improvement in energy efficiency over the 2013 target emission rate and is in line with the Paris Accord. Flexibility of how this will be achieved is depended on type and scale of proposal. Policy HOU10 restricts water uses through design. Climate Change is recognised as an important consideration to the Council and further consideration

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
					will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. As such the emerging Local Plan incorporates climate change at its heart and seeks to addresses a wide spectrum of matters from adaptation and improved resilience through a number of standalone and integrated policies and proposals which must be taken as a whole.
HOU11	Historic England (1215813)	LP705	Object	<p>Listed buildings, buildings within conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. These considerations/exceptions should be reflected in the policy.</p> <p>In developing policy covering this area you may find the Historic England guidance Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf/ to be helpful in understanding these special considerations.</p>	Noted - consider the wording of Policy HOU 11 and how this relates to the Historic Environment in the preparation of the policy.
HOU11	Duchy of Cornwall, Mr Nick Pollock (931132)	LP328	Support	OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: The approach set out in Policy HOU11 of prioritising “designing out” emissions followed by use of low carbon technologies is supported. As with several other policies, it is suggested that HOU11 could be simplified through referencing NPPF paragraphs 150-154.	Support Noted.

Draft Policy	Name & Comment ID	Ref	Nature of Response	Summary of Comments (Statutory Consultees & Other Organisations)	Council's Response
HOU11	Pigeon Land Ltd & JM & ID Clifton (1217026)	LP626	Support	<p>OFFICER SUMMARY - SEE CONSULTATION PORTAL FOR FULL REPRESENTATION: Whilst we support the policy aspiration to achieve high standards of environmental sustainability, further evidence is required on why the target of a 19% reduction in CO2 emissions has been selected (other than to achieve an equivalent to the Code for Sustainable Homes Level 4) to fully understand whether the draft policy is the best way to achieve the Council's objectives, bearing in mind that this will not help to reduce the energy efficiency of existing housing stock and the fact that Government is expected to consult on a new Part L of the Building Regulations later in 2019 with an updated document to be published in 2020.</p>	<p>Support noted. Climate Change is recognised as an important consideration to the Council and further consideration will be given through the finalisation of policies. It is recognised that the challenge for the Local Plan is to take a proactive approach to the development and use of land to contribute to mitigation and adaptation to climate change in a way that contributes positively to meeting local, national and international climate change challenges and commitments. The Government has recently consulted on moves towards reducing reliance on fossil fuel heat sources and introducing carbon zero homes through building regulations.</p>
HOU11	Norfolk Homes Ltd / Norfolk Land Ltd, Mr A Presslee (1216619 1216614)	LP311	Support	<p>The implementation of an energy hierarchy whereby energy efficiencies through design/fabric over renewable energy/low carbon 'add-ons' is welcomed; it is an approach promoted by Norfolk Homes through its own designs and development proposals during the course of the current Core Strategy, if not before. However, the Council should be aware that the provisions of Policy HOU11 (19% reductions below the Target Emission Rate of the 2013 Building Regulations (Part L)) are likely to necessitate a significant proportion of applications seeking flexibility via constraints of technical feasibility and viability. The draft policy's provision will have a significant impact on the approach to site layouts, where dwellings will need to be orientated in a more energy efficient manner, but also affect building design in order to maximise building orientation. It will also potentially restrict the materials pallet to be used on a development. In turn, these will impact on density and viability issues. Building orientation will be paramount in future schemes, in particular in order to avoid a predominance of bland, grid formations in housing schemes. The requirement that "all development proposals should be accompanied by a separate Sustainability Statement..." appears especially onerous. Does the policy actually mean all development proposals (i.e. all planning applications)?</p>	<p>Support noted. Consider comments in the future iteration of the Plan.</p>

Statutory & Organisations	Number Received	Combined Summary of Responses (Policy HOU11)
Objection	0	All respondents from the development industry were supportive of this policy and the designing out of emissions followed by the use of low carbon technologies. No substantive issues were raised. A number of issues were put forward for further consideration, these included: The removal of the requirement to include a separate energy statement (on all development) - instead allow developers to incorporate supportive information in the Design and access Statement. Further consideration around the impacts on viability and density due to the impacts on site layout and potential restrictions on development materials. One organisation suggested that the policy should be more prescriptive in its use of renewable technology and a demonstration how development twill achieve carbon neutrality.
Support	6	
General Comments	0	

Alternatives

	Objection	Support	General Comments	Summary of Responses (Alternatives Policies)
HOU11	0	0	1	General comment does not raise support for any of the alternative options or question the support for the preferred option made against the First Draft Local Plan (Part 1).